

June 14, 2013

VIA ECF AND HAND DELIVERY

Hon. Magistrate Judge Nathanael Cousins
United States District Court
Courtroom A, 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *United States of America v. Walter Liew, et al.*
U.S. District Court, Northern District of California, Case No. CR 11-0573-JSW (NC)

Dear Judge Cousins:

Defendants Walter Liew and USA Performance Technology, Inc. (collectively, “Defendants”) submit this letter brief regarding the deadlines for Rule 16 expert disclosures in accordance with the Court’s June 5, 2013 Order. Dkt. 334.

I. Introduction.

This case has been pending for nearly two years—since July 2011, when the Government arrested Walter Liew and filed its criminal complaint against him. While Mr. Liew lingers in jail, unable to meaningfully assist the defense, defense counsel have tried every which way to get the Government to define the vague and sweeping allegations against Mr. Liew. Although defense counsel hoped that the Government’s identification of “case-in-chief” documents would assist in narrowing the issues and streamlining this case in preparation for trial, it has done the opposite. The “identification,” which consists primarily of lists of hundreds of thousands of documents, has only created more work for defense counsel, because many of the listed documents are impossible to locate. Of particular relevance here, one of the many lists in the Government’s “identification” contains over a *quarter million* documents, “some” of which, according to the Government, will be the basis of its expert testimony.

Given this state of affairs, prompt disclosure of the Government’s Rule 16 expert reports, which will assist the defense in understanding the nature of the Government’s allegations, is essential to the progress of this case. All motions attacking the Second Superseding Indictment have been decided, and Judge White has indicated that, on July 25, he will set the earliest possible trial date for some time in 2013. The time is ripe to order the disclosure of the Government’s expert reports, which Defendants have been requesting since at least April and which the Government originally promised to provide by July 1.

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 2

II. Relevant Background.

The parties were last before the Court on February 27, when Defendants asked that the Government be required to identify the items it intends to use in its case in-chief pursuant to Federal Rule of Criminal Procedure 16(a)(1)(E)(ii). The Court ordered the Government to produce “literally all” of its “case-in-chief” documents by April 30, 2013. Dkt. 257. Judge White upheld that ruling on appeal and ordered the Government to comply with the Court’s disclosure order by May 30, 2013. Dkt. 294.

On April 17, 2013, the parties filed a Joint Status Report with Judge White in anticipation of the April 18 status conference on calendar, during which the parties expected the Court to set schedules for motion practice and trial. Dkt. 298. The Government represented that it anticipated producing only a few remaining categories of documents in the near future. *Id.* The parties agreed that this case should be tried in 2013, and jointly proposed that trial begin on October 21. *Id.* Defendants listed the types of motions they intend to bring before trial, and the parties proposed deadlines for expert reports. *Id.* The parties jointly proposed that, pursuant to Rule 16(a)(1)(G), the Government would produce a summary of any expert testimony it intends to use by July 1, 2012, but they disagreed about the deadline for the Defendants’ responsive expert disclosure—the Government proposed July 31, 2013 and Defendants proposed August 28, 2013. *Id.*

After the parties’ status conference, Judge White ordered that the Defendants’ motions be heard in two tranches. Dkt. 303. He ordered that the motions for bills of particulars and the motions attacking the Second Superseding Indictment be heard on June 6, and that the motions to suppress and motions to sever and bifurcate be heard on July 25. *Id.* Judge White stated that he intends to set a trial date at the July 25 motions hearing, and that he will choose the “earliest time that this case could go to trial.” Exh. A (hearing transcript) at 21; *see also id.* at 16-17 (stating “the court’s desire to have this case move forward expeditiously”); *id.* at 15 (“This case is going to go forward, and it’s going to go forward expeditiously”). Judge White also stated that deadlines for expert submissions are within the scope of the Order referring discovery issues to this Court and should be raised with this Court in the first instance. Exh. A at 8, 19-20.

A. Expert report deadlines.

The parties immediately met and conferred about deadlines for expert reports, but continued to disagree about the number of days defendants should have to file their responsive report after the Government’s July 1 report. On April 22, defense counsel sent the Government a stipulation setting forth the parties’ positions—that all parties agreed that the Government’s report would be due on July 1, that defendants proposed that their report be due 60 days later, and that the Government proposed that defendants’ report instead be due 30 days later. Exh. B. On May 8, counsel for the Government responded with a change of position from the July 1 deadline the Government originally agreed to for its expert report, stating that “we should not decide on the expert disclosure schedule until Judge White decides the motions and selects a trial date. Given

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 3

the motions that have been and will be filed, and the lack of a trial date, it doesn't make sense to start working on expert reports yet." *Id.*

B. The Government's identification of case-in-chief documents.

On May 31, the Government sent a letter identifying its "case-in-chief" documents. That identification is not the "exhibit list" the Government complained it was being asked to file prematurely. Dkt. 291. Far from it. The May 31 letter identifies a *massive* universe of documents, including (1) DVDs containing thousands of files and (2) "attachments" to the letter consisting of Excel spreadsheets that themselves list hundreds of thousands of documents (including untranslated Chinese documents). Exh. C.¹ Most troublingly, many of the lists of files provided by the Government do not give defense counsel sufficient information to locate the underlying documents. By way of example only:

- Many of the entries on Attachment A do not have corresponding SVE evidence numbers, so there is no way for defense counsel to know what documents the Government is identifying.
- Attachment C is a list of bank accounts and/or "wire transfers" that does not indicate which *actual documents* the Government is identifying.
- Attachment G (which itself identifies *a quarter million documents*) consists of lists of files that include some (but not all) file path names and several unfamiliar image names.
- The same is true of Attachment D. (Moreover, one of the lists of files in that attachment is a bulk listing of *all 47 drive images* the Government produced early last summer in their entirety.)

In other words, this "identification" of key documents does nearly nothing to expedite this case and assist defense counsel in preparing for trial. It points counsel to the same old haystack (albeit a slightly smaller one) and asks that we continue to hunt for the proverbial needle. *Of particular relevance to this letter brief, the Government expects that "some" of the quarter million documents in Attachment G will be the subject of expert testimony.* Exh. C at 3-4.

Defense counsel raised the deficiencies in the Government's "case-in-chief" identification and asked the Government to produce a single hard drive containing the hundreds of thousands of documents it has identified. Exh. D. The Government has promised to meet and confer with defense counsel regarding these issues on June 17. Exh. D. Unless the Government agrees to give defense counsel a single hard drive with all of the actual "case-in-chief" documents in native form, that meeting will be the beginning of a very long effort to actually find the

¹ Because the attachments to the Government's letter are extremely voluminous, are marked as attorney work product and/or contain third-party bank account numbers, we do not attach them here in their entirety, but instead provide redacted representative excerpts.

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 4

hundreds of thousands of documents identified by the Government, which defense counsel anticipates will take months. *Id.*

C. Motions attacking the Second Superseding Indictment (“Indictment”).

Aside from requesting a set of case-in-chief documents, defense counsel attempted to narrow and streamline the issues in this case by filing a motion to dismiss certain counts of the Indictment and a motion for bill of particulars on May 2, 2013. Both motions focused on the vagueness and overbreadth of alleged trade secrets 1 and 5, which make it impossible for defendants to understand what they are accused of misappropriating (or attempting to misappropriate). Dkts. 312, 314. Trade Secret 1 is defined as “*the* DuPont chloride-route process to manufacture TiO₂,” including “ways and means in which proprietary and non-proprietary components were compiled and combined by DuPont to form substantial portions of the TiO₂ manufacturing process.” Dkt. 269 at ¶ 14(a) (emphasis added). In a similar spirit, Trade Secret 5 is defined as both (a) the entirety of a 407-page DuPont manual created in 1985 to set design criteria for titanium dioxide plants, as well as (b) “numerous discrete trade secrets within in [sic] it.” *Id.* at ¶ 14(e).

Defendants requested that all allegations relating to trade secrets 1 and 5 be dismissed (Dkt. 312), and in the alternative sought a bill of particulars regarding all of the financial and trade secret allegations. Dkt. 314. Defendants noted that the chloride route process for manufacturing titanium dioxide is complex, combining thousands of pieces of equipment with a myriad of operating parameters. Dkt. 314 at 1. Discovery has revealed that DuPont engineers have advised the Government of hundreds of perceived “similarities” between the USAPTI designs and features at various DuPont plants. *Id.* This means that thousands of *potential* trade secrets fall within the allegations of the Indictment or are suggested by discovery. The Defendants noted that trial preparation is simply impossible in this posture. *Id.* This is especially true given the volume of public disclosures in the titanium dioxide field, the volume of discovery materials produced in this case, the Government’s “derivative use” theory at the heart of its case, and Mr. Liew’s inability to assist in his defense given his lengthy and continued incarceration. *Id.*

On June 9, Judge White denied Defendants’ motion to dismiss the counts in the Indictment that depend on trade secrets 1 and 5. Dkt. 338. He also denied Defendants’ request for a bill of particulars as to trade secrets 2-5, considering it significant that “the Court ordered the United States to provide the Defendants with the documents it intends to introduce in its case in chief by May 30, 2013.” Dkt. 338 at 11. Judge White ordered the Government to provide a bill of particulars as to trade secret 1 by June 25, noting:

Specifically, in light of the fact that these counts charge Defendants with attempt, the United States shall provide a bill of particulars that sets forth its theory of what Defendants reasonably believed the trade secret to be, *e.g.*, whether the United States will argue that Defendants reasonably believed the entire chloride-route process to manufacture TiO₂ was a trade secret or whether it will argue the Defendants reasonably believed a subset of the process was a trade secret. If the

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 5

latter, the United States, taking into account the EEA's definition of a trade secret, shall identify with particularity: (1) the "ways and means," described in paragraph 14.a; and (2) the "proprietary and non-proprietary components," described in paragraph 14.a.; (3) and the resulting compilations and combinations that formed substantial portions of the TiO₂ manufacturing process.

Dkt. 338 at 11-12.

III. Argument.

A. The Government's expert reports should be due no later than July 15, 2013.

Rule 16(a)(1)(G) provides that "[a]t the defendant's request, the government must give to the defendant a written summary of any testimony that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence during its case-in-chief at trial." Fed. R. Crim. Pro. 16(a)(1)(G). This summary "must describe the witness's opinions, the bases and reasons for those opinions, and the witness's qualifications." *Id.* Under Rule 16, "it is expected that the parties will make their requests and disclosures in a timely fashion." *See* Fed. R. Crim. Pro. 16 advisory committee's note.

Defendants have requested since mid-April that the Government make its expert report disclosures by July 1. Although the Government initially agreed to that deadline (Dkt. 298), it has now changed its tune, asserting that deadlines for expert reports should not be set until after Judge White sets a trial date, which the parties anticipate will be on July 25. Exh. B. The Government's proposed course of events will not allow the parties sufficient time to prepare for trial and will delay resolution of this case, which already has dragged on for nearly two years while Mr. Liew remains incarcerated.

First, waiting until the end of July to even set a deadline for expert reports does not allow either party sufficient time to prepare for a 2013 trial. Judge White made it very clear that, on July 25, he intends to choose the "earliest time that this case could go to trial." (Exh. A at 21), and that he wants to "have this case move forward expeditiously." *Id.* at 16-17; *see also id.* at 15 ("This case is going to go forward, and it's going to go forward expeditiously"). Defendants intend to continue to request an October trial date, and expect that Judge White will choose a trial date sometime this fall, and before the end of 2013. If this case is tried in October, the parties cannot wait until after July 25 to even discuss expert report deadlines. The Government's Rule 16 expert disclosures should be due no later than July 15, and Defendants' responsive disclosures should be due 60 days later, by September 13. This is the only way to allow for the October trial that all the parties agreed on. Dkt. 298.

Second, requiring the Government to provide its expert report sooner rather than later will assist in narrowing the issues and in streamlining this case for trial. Although Defendants had hoped that the Government's case-in-chief identification would accomplish those ends, it falls woefully short, and in fact has created *more* work for defendants, who must go on a wild goose hunt to locate the hundreds of thousands of documents the Government has "identified." *See supra*,

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 6

p. 2-3. This will take months. In the meantime, the Defendants must prepare to respond at a 2013 trial to complex and highly technical allegations of trade secret theft. Those allegations will be supported by expert testimony that relies (among other things) on “some” of the quarter million documents identified in Attachment G to the Government’s May 30 letter. Exh. C at 3-4. The only way for the Defendants to prepare a defense against the sweeping and complex charges against them is with the benefit of an expert report that lays out the bases of the Government’s allegations.

Third, there is no reason not to order the Government to make its Rule 16 expert disclosures by July 15. The Government has culled through the 55 million documents produced in this case and identified the ones it intends to use in its case-in-chief. Although that identification does little to narrow the universe of documents produced in discovery, presumably the exercise required the Government to make strategic decisions about the presentation of its case-in-chief and the nature of its allegations against the Defendants. Moreover, by June 25, the Government will have provided a Bill of Particulars regarding trade secret 1, which requires that the Government specify the nature of its allegation that Defendants attempted to misappropriate the entire chloride route process. Accordingly, much of the work relevant to the Government’s expert reports has already been done.

Fourth, all motions attacking the pleadings have been decided. The fact that the Defendants have not yet filed their motions to suppress and sever (which will be heard on July 25) is no reason to delay the exchange of expert reports. Any motions to sever defendants or charges will, if successful, result in multiple trial dates. They will not substantially affect the content of the Government’s expert testimony. It is true that the motions to suppress may result in the suppression of evidence that could be considered by the Government’s experts in forming their opinions. If the Defendants’ motions to suppress are successful, Defendants agree to give the Government two weeks to amend their expert reports in light of any suppressed evidence.

- B. Defendants’ responsive report should be due 60 days later, or on September 13, 2013.

Rule 16(b)(1)(C) provides that a defendant must furnish a written summary of any testimony he intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence as evidence at trial *if* he has requested the same of the Government under Rule 16 *and* the Government has complied. Fed. R. Crim. Pro. 16(b)(1)(C). Accordingly, Defendants’ obligation to provide the Government with the defense experts’ reports is not even triggered until the Government has produced its reports.

Defendants respectfully request that they be given sixty days, or until September 13, to respond to the Government’s expert reports. At the time of the parties’ April 17 Joint Status Report, Defendants had given the Government a total of approximately two and a half months (until July 1) to provide its report. Dkt. 298. Defendants have now extended that proposed deadline to July 15—nearly three months after Defendants’ initial request. Given the amount of time the

Hon. Magistrate Judge Nathanael Cousins

June 14, 2013

Page 7

Government has had, it would be equitable to give Defendants at least 60 days to provide their expert report.

Moreover, Defendants will need at least sixty days to respond to whatever report the Government produces. As this Court now has heard many times, the charges in this case are highly technical and complex, and the Defendants' expert will require time to understand and respond to them (once they have been properly defined, which the Government's expert report presumably will do). Moreover, a substantial amount of the information on which the Defendants' expert will rely is contained in the C-1 documents, which under the Protective Order cannot be copied, emailed, or kept on a computer connected to the Internet. Dkt. 168. This means that Defendants' expert must travel to San Francisco and view the C-1 documents in defense counsel's offices—hardly an efficient way to prepare expert reports.² In light of these restrictions, a 60-day response time is appropriate.

IV. Conclusion.

For the foregoing reasons, we respectfully request that the Court order that:

- (1) The Government's Rule 16 expert reports be due no later than July 15, 2013; and
- (2) The Defendants' responsive Rule 16 expert reports be due no later than September 13, 2013.

Respectfully submitted,

/s/ Simona A. Agnolucci

Simona A. Agnolucci

cc: John H. Hemann, United States Attorney's Office
Peter B. Axelrod, United States Attorney's Office
John M. Potter, Quinn Emanuel
Robert P. Feldman, Quinn Emanuel
Edmund D. Lyons
Jerome J. Froelich, Jr.
Doron Weinberg

² In contrast, the Government presumably will have the benefit of being able to show whatever documents it wishes to its consultants at DuPont over email.

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
BEFORE THE HONORABLE JEFFREY S. WHITE, JUDGE

UNITED STATES OF AMERICA)
)
Plaintiff,)
) No. C-11-0573 JSW
vs.)
)
WALTER LIEW, ET AL.,)
) San Francisco, California
) Thursday, April 18, 2013
Defendants.)
_____)

TRANSCRIPT OF PROCEEDINGS

APPEARANCES:

For Plaintiff: United States Attorneys' Office
450 Golden Gate Ave., 11th Floor
San Francisco, California 94102
BY: **JOHN HENRY HEMANN, ESQ.**
PETER BENJAMIN AXELROD, ESQ.

**For Defendant
Walter Liew:** Keker & Van Nest, LLP
633 Battery Street
San Francisco, California 94111
BY: **STUART L. GASNER, ESQ.**
SIMONA A. AGNOLUCCI, ESQ.

Also Present: **AMY LO, MANDARIN INTERPRETER**

(FURTHER APPEARANCES ON NEXT PAGE.)

1 **FURTHER APPEARANCES:** (CONT'D)

2 **For Defendant**
3 **Christina Liew:**

Law Offices of Doron Weinberg
523 Octavia Street
San Francisco, California 94102
BY: DORON WEINBERG, ESQ.

4 **For Defendant**
5 **Robert Maegerle:**

McKenney & Roelich
1349 West Peachtree Street
Two Midtown Plaza, Suite 1250
Atlanta, Georgia 30309
BY: JEROME J. FROELICH, JR., ESQ.

6 **For Defendant**
7 **Pangang Group:**

Quinn Emanuel
555 Twin Dolphin Drive, 5th Floor
Redwood Shores, California 94065
BY: ROBERT P. FELDMAN, ESQ.

8
9
10
11
12 ---o0o---

13
14
15
16
17
18
19
20
21
22
23
24
25

1 Thursday, April 18, 2013

2:15 p.m.

2 P R O C E E D I N G S

3 **THE CLERK:** Calling case 11-573, United States versus
4 Walter Liew, United States versus Christina Liew, United States
5 versus Robert Maegerle, United States versus USA Performance
6 Technology, United States versus Pangang Group Company, United
7 States versus Pangang Group Steel Vanadium & Titanium Company,
8 United States versus Pangang Group Titanium Industry Company,
9 and United States versus Pangang Group International Economic &
10 Trading Company.

11 Counsel, please state your appearances.

12 **MR. HEMANN:** Good afternoon, Your Honor. John Hemann
13 and Pete Axelrod for the United States.

14 **THE COURT:** Good afternoon.

15 **MR. AXELROD:** Good afternoon.

16 **MR. GASNER:** Good afternoon, Your Honor, Stuart
17 Gasner and Simona Agnolucci, Kecker & Van Nest for defendants
18 Walter Liew and USA Performance Technology, Inc.

19 **THE COURT:** Good afternoon.

20 Hello, sir.

21 **MR. FROELICH:** Your Honor, Jerome Froelich for
22 Mr. Maegerle, who's standing right next to me.

23 **THE COURT:** Good afternoon.

24 **MR. WEINBERG:** Doron Weinberg appearing on behalf of
25 Christina Liew, who is here and assisted by the Mandarin

1 interpreter.

2 **THE COURT:** Good afternoon.

3 (Judge greets defendant in Mandarin.)

4 **MR. FELDMAN:** Good afternoon. Robert Feldman
5 appearing specially.

6 **THE COURT:** On behalf of the so-called Pangang
7 defendants?

8 **MR. FELDMAN:** Correct.

9 **THE COURT:** So the first question I have -- I
10 reviewed your status -- joint status report, and I appreciate
11 that. And I've been thinking about how best to manage this
12 case in light of the parties' positions, and I have a couple of
13 questions, and then I'm going to -- acting on the information
14 that counsel has provided to the Court, I'm going to set some
15 deadlines here.

16 So the first question is, how do the parties -- now, I'll
17 ask the Government first: How do the parties intend to proceed
18 regarding the Pangang defendants? I'll just say the Court
19 knows that it's not been requested to dismiss the indictment as
20 to those defendants, so it remains outstanding.

21 **MR. HEMANN:** So, Your Honor, firstly, we don't
22 believe that there are other steps that the United States can
23 take to effect service on the Pangang defendants, in light of
24 the Court's two orders. So we're at a standstill in terms of
25 further efforts to bring them into the case.

1 We would ask the Court, in the absence of the Court taking
2 some action the Court contemplates on its own, for 30 days.
3 We're consulting with the appropriate Department of Justice
4 entities in Washington about what possible next steps would be,
5 given the number of folks that need to be involved, we're
6 looking at about 30 days. We'd like to come back and talk to
7 Your Honor and let you know the Government's position 30 days
8 from now.

9 **THE COURT:** I know, Mr. Feldman -- I know you are
10 here specially, but do you have a position on this?

11 **MR. FELDMAN:** None other than when Mr. Hemann -- I
12 would ask Your Honor -- I would ask, through the Court, that
13 Mr. Hemann consider that his department has requested a rule
14 change to Rule 4, which changes -- requested in October of last
15 year unbeknownst to me, and I assume unbeknownst to the Court.
16 And in that connection, I would ask that Mr. Hemann consult
17 with whoever made that request as he considers how to further
18 proceed.

19 **THE COURT:** All right. Well, he's heard your
20 message. I'm sure he's aware of that. And that -- and I think
21 that's probably a prudent way to go.

22 The only thing I'll say, and I think this is probably
23 implicit of what Mr. Hemann has just said, is that whatever the
24 Court does today vis-a-vis set dates, is not going to be
25 stalled by the Pangang defendants.

1 **MR. HEMANN:** That's correct, Your Honor.

2 **THE COURT:** Their status. Whatever happens with them
3 is almost certainly going to happen separately, if it happens
4 at all.

5 **MR. HEMANN:** Indeed. We would urge the Court to go
6 forward with regard to dates, et cetera, with Mr. Liew and
7 Mrs. Liew, Mr. Maegerle and USA PTI, separate from what we're
8 considering to do with regard to the Pangang defendants.

9 **THE COURT:** All right. So what -- Ms. Ottolini,
10 let's set a status date for -- just for the Pangang defendants,
11 unless events overtake that. In other words, if there's a
12 change in the Government's position or a motion filed by the
13 Pangang defendants, then that may -- one may supersede the
14 other. I don't know. But let's at least set a date so we have
15 a date to come back here and see where we are.

16 **MR. FELDMAN:** And I'm sure Mr. Hemann will agree to
17 let me know ahead of time what he plans to do so that -- it may
18 be that it's not necessary for us to appear.

19 **THE COURT:** Of course. And it may be -- one
20 possibility is the Government -- I'm not saying they would or
21 they should, but they can, is file an appeal, and that clearly
22 would -- well, at least temporarily arrest the court of
23 jurisdiction, and everybody should note, at least Mr. Feldman
24 and the Court should know, so we can vacate that date.

25 **MR. HEMANN:** Absolutely, Your Honor.

1 **THE COURT:** Ms. Ottolini, please set a date and make
2 sure that all counsel for those defendants and the Government
3 are available.

4 **THE CLERK:** May 16 at 2:00 p.m.

5 **MR. FELDMAN:** I can't do it that day. I could do it
6 the day -- I can't do it that day.

7 **THE CLERK:** May 23rd at 2:00 p.m.

8 **MR. FELDMAN:** Somebody could be here that day.

9 **THE COURT:** The 23rd.

10 **MR. FELDMAN:** Somebody could be here.

11 **THE COURT:** Let's do the 23rd, then.

12 Is that acceptable to the Government?

13 **MR. HEMANN:** Yes, Your Honor.

14 **THE COURT:** Very well. So we'll take that -- let's
15 now talk about the other defendants.

16 You might want to step back. You can certainly stand
17 there if you would.

18 **MR. FELDMAN:** No. I'm afraid something will change.
19 Thank you.

20 **THE COURT:** Thank you.

21 So Mr. Feldman has stepped back. So here's what I'm --

22 **MR. FELDMAN:** Your Honor, excuse me. I'm going to
23 leave if you may.

24 **THE COURT:** Of course. Yes, you may. Or you can
25 stay if you want.

1 **MR. FELDMAN:** No thank you.

2 (Mr. Feldman leaves the proceedings.)

3 **THE COURT:** All right. So on discovery, the first
4 issue that's been raised in the status report is discovery.
5 And if the parties have a dispute about the deadline for
6 reciprocal discovery and the deadline to disclose experts,
7 that's within the scope of the referral to Magistrate Judge
8 Cousins, and they should raise those issues with him in the
9 first instance.

10 And if the parties believe that because of the Court's
11 order with respect to disclosure by the Government in some ways
12 constitute a decision to take discovery back from the
13 magistrate judge, that wasn't the case. That was an appeal,
14 and so -- and the matter is still before Judge Cousins, and
15 I've given him substantial delegated authority. So that's the
16 first point; reciprocal discovery issues to Judge Cousins.

17 And in the same vein, any so-called omnibus motion for
18 discovery should be filed before Judge Cousins in the first
19 instance, since he's familiar with the matter, and that's part
20 of his charter. So going to direct you to go back to
21 Judge Cousins.

22 **MR. GASNER:** I believe, Your Honor, that the Court
23 has previously said that matters of *Brady* and *Giglio* discovery
24 are still retained by this Court. So it may be that we will
25 need to file two different ones.

1 **THE COURT:** Right. That's very possible. And I
2 would hope to avoid *Brady* motions because *Brady* motions --
3 well, I would hope to avoid a motion. I would think that would
4 be a matter of case management, and my position on that is well
5 known, and that is I -- as I did with respect to the appeal,
6 I'm going to order -- now that we're going to have dates, those
7 dates are going to serve as a baseline for disclosures, and
8 they're going to be aggressive deadlines, and they're going to
9 be -- hoping that it won't require motion practice. But
10 knowing the Government attorneys involved here, I don't expect
11 that there will be any issue with this, but we'll see.

12 So, yes, I'm retaining the *Brady* and *Giglio*. So that may
13 take the omni out of the omnibus, but we'll do that on a
14 separate track.

15 So the next issue that you all raise are motions for
16 Rule 17 subpoenas. They can be submitted to me at any time, as
17 early as you want on a rolling basis. You don't need to do
18 that as a package. Just keep submitting them. Make sure --
19 don't do them on a routine, rote basis. Sometimes we just get
20 sort of boilerplate language from the *Nixon* case. I need
21 substance.

22 Keep in mind it's a discovery -- it's not a discovery
23 tool; it's a trial tool. If it's used as a discovery tool, it
24 will not receive a sympathetic ear from this Court.

25 In that regard, the Court refers the parties to paragraph

1 4 of the Court's guidelines for motions -- final pretrial
2 conferences and trials, which the Court revised this month. So
3 there's a new addition, and it has some rules with respect to
4 that. So please look at that as well.

5 Now, let me just say -- I want to say something about a
6 trial date. Because as all of you know -- most of you know,
7 this Court believes in truth in trial dates and reliability of
8 trial dates. When I set a trial date, it doesn't change. I
9 made a comment -- I wrote in my order that I intended to set a
10 trial date at this hearing, and have this case tried in 2013.

11 Having seen the status report and trying to work the dates
12 in a way that accomplishes that, it seems like that is -- with
13 all we have to do -- and I'm not saying any of it -- all of it
14 is substantive, and all of it is important -- that I'm not
15 going to set a trial date at this time. I want to get these
16 motions resolved, and I want to get them resolved
17 expeditiously, so I'll tell you what I'm going to do, and then
18 we'll see where we go.

19 But I don't -- I would rather set a trial date at a time I
20 can live up to my mantra of truth in trial dates. Because if I
21 set one now, it will just be like throwing a date out with
22 no -- if you saw the dates, you'd say that's incredible because
23 there's not enough time to do all this stuff and try the case
24 on the given day.

25 So what I'm going to do, however, is I'm going to stage

1 these motions so that the motions for a Bill of Particulars and
2 attacking the second superseding indictment will be heard
3 before the suppression and the severance motions.

4 So the -- again, you'll see that these deadlines are
5 fairly aggressive but reasonable. Two can be side by side.

6 So with respect to motions for Bill of Particulars and any
7 attack on the second superseding indictment, the opening briefs
8 are due on May 2nd.

9 The opposition briefs will be due May 16th.

10 The replies will be due May 23rd.

11 And the hearing will be on June 6th at 2:00 p.m. on those
12 motions.

13 Now, there was a statement about -- in the status -- the
14 joint status about motions to suppress and to sever defendants
15 and bifurcate issues. So the opening briefs for that round
16 will be June 27th at -- all of these are in 2013.

17 The opposition briefs will be due on July 11th.

18 The replies will be due on July -- so I'll say it again.

19 The 27th for the openings. The opposition is on the
20 11th of July. The reply is on the 18th of July, and the
21 hearing on July 25th at 2:00 p.m. on motions to suppress and to
22 sever defendants and bifurcate issues.

23 If those motions are not filed or they're filed -- they're
24 fairly simple to resolve, I might consider accelerating the
25 schedule.

1 In other words, I'm building in the things you said you
2 want to do -- mostly the defendants, and I'm going to give them
3 that full opportunity. But these dates are -- these dates can
4 be moved more aggressively, should some of these things -- some
5 of these motions not be filed.

6 Now, there was some request or some discussion about
7 *Daubert* motions, and the Court would be inclined to have a
8 further hearing on *Daubert* motions 30 days before the final
9 pretrial conference. We'll get into that a little bit more as
10 we get deeper into the case. Once we've resolved all of these
11 issues, and depending upon the -- what happens at the hearing
12 on -- both sets of hearings; June 6th and July 25th, will drive
13 the Court's setting the trial date and pretrials with -- and I
14 would anticipate, in connection with the trial date -- when
15 that is set -- that there will be some further orders by this
16 Court with respect to discovery, *Giglio*, *Brady*, *Jencks*, and the
17 so-called open book policy that I recently learned the
18 U.S. Attorney had. We have to figure out what volume of what
19 book before we know what book is open.

20 Anyway, that's the plan. And I wanted to raise a
21 question, given that I have all of you here, and that -- by the
22 way, counsel is correct when they've stated that the Court had
23 another substantial trial coming up in October. Depending upon
24 what happens in that case -- and I have no reason to believe
25 that one is not going to go one way or the other. I think it's

1 not clear for sure that it will or won't. But I think it will.
2 And that -- if that goes away, that may open things up for this
3 case.

4 But I wanted to explore whether or not any defendant was
5 willing to consider at this point having the Court send them to
6 a settlement conference. Is there any interest -- have any of
7 the parties discussed that in a way that they're willing to
8 share with the Court?

9 Let me first ask the Government. Does the Government have
10 any interest in this?

11 **MR. HEMANN:** I think that we're not opposed to it,
12 Your Honor. There's some -- we're not opposed to it. Let me
13 just leave it at that. We're not opposed to it, Your Honor, if
14 Your Honor were to order it and, if the defendants would be
15 interested in it.

16 **THE COURT:** I don't know that I would order it.

17 **MR. HEMANN:** Or encourage it.

18 **THE COURT:** Yes. Mr. Weinberg, what's your view?

19 **MR. WEINBERG:** My view is that it would be of
20 interest for Christina Liew to explore the possibility of
21 settlement.

22 So on her behalf, I would accept the suggestion.

23 **THE WITNESS:** All right. What about from Mr. Liew's
24 perspective?

25 **MR. GASNER:** Well, Your Honor, I think it's unlikely

1 to be productive, would be my guess. We're certainly open to
2 showing up and seeing whether the Government has changed its
3 attitude. We're always open to that, but from the signals
4 they've sent so far, I don't think it's likely to be very
5 productive, but if they think it is, we'll show up.

6 **THE COURT:** What about from your client's
7 perspective?

8 **MR. FROELICH:** Yes, Your Honor. I speak for -- I
9 think you never know until you sit, and there's not been any
10 sitting.

11 **THE COURT:** Right. I'm going to refer you all to --
12 I may be the proverbial cold dog -- to Judge Beeler,
13 unless anybody has any objection.

14 **MR. HEMANN:** May I just have a quick word on this
15 with Mr. Gasner?

16 **THE COURT:** Sure.

17 **MR. HEMANN:** I'm sorry.

18 **THE COURT:** Go ahead.

19 (Pause in proceedings.)

20 **MR. HEMANN:** There's some complexity to this,
21 Your Honor. Would it be acceptable to the Court if the parties
22 had a discussion with Judge Beeler about the advisability of a
23 settlement conference? And I think in that confidential forum,
24 we could have a -- we could sort out whether as a group we feel
25 that it's an appropriate expenditure of our time. And, if as a

1 group, with Judge Beeler's assistance, we decide that it's not
2 an appropriate use of our time, that we don't do it.

3 **THE COURT:** Of course. And that's why I said I
4 wouldn't order you, but I think to do this correctly, there
5 would have to be a formal referral. So I'll refer you.

6 But I will say on the record that -- of course, I
7 couldn't -- I won't and I -- I don't know if I even have the
8 authority to do it, and I wouldn't use the authority if I had
9 to -- order you. You may decide to change your mind. And
10 that's absolutely within the Court's -- so this is, shall we
11 say it's not mandatory; it's "courtitory" that you go to
12 Judge Beeler and have whatever discussions you think are
13 appropriate, even if they are preliminary, on the question of
14 whether -- as you mentioned, whether it's even appropriate to
15 have a settlement conference, and leave it to the parties,
16 based upon that to say we don't think it's productive to go
17 further, and that would be fine.

18 But those -- but that referral is without -- in no way
19 impedes the dates that I've already set.

20 **MR. HEMANN:** Thank you, Your Honor.

21 **THE COURT:** This case is going to go forward, and
22 it's going to go forward expeditiously. And as I've told you,
23 I think I've taken into account all of the concerns of counsel.
24 And in so doing, I really intend to move this case along toward
25 a trial date and get this case -- if it goes that far. Of

1 course, there's going to be preemptive motions to get to trial.
2 So that's what the parties should be working toward.

3 So that takes care of the Court's agenda, which I've
4 essentially built from the statuses. And then I don't know
5 that we need another -- I would think that on any of these
6 dates when we're going to have hearings, there'll also be
7 status.

8 So I think to -- unless your client wishes to waive their
9 appearance, which they can do if they want, I'd like the
10 clients there as well, the parties, so that we can have a
11 substantive discussion about the case and be thinking about
12 the -- I will know my schedule in June, and you'll all know
13 your schedule, and we can see where the trial might fit in this
14 process.

15 So with that said, Mr. Hemann and Mr. Axelrod, is there
16 anything further?

17 **MR. HEMANN:** Your Honor, the only motion that I think
18 might --

19 **THE COURT:** I wanted to say one other thing. I've
20 said throughout the papers, and I think I want to make it clear
21 that, although I have observed as part of the Court's interest
22 in moving this case along, that Mr. Liew is currently in
23 custody. That I want to make it clear, Number 1, that although
24 that is a factor, it is not the only factor. I have said in my
25 order with respect to release that my order is without

1 prejudice to Mr. Liew to try to make a further presentation for
2 the Court to -- perhaps a different outcome. And so I don't
3 want anything that I've said or done today to change my
4 openmindedness toward further information being brought to the
5 Court's attention. But if that status were to change -- his
6 custodial status -- that would not dampen the Court's desire to
7 have this case move forward expeditiously.

8 All right. Now, I'm sorry.

9 **MR. HEMANN:** Your Honor, the one motion that the
10 Court didn't set a date for that I think it might be worth
11 discussing, at least briefly, is Mr. Froelich had talked
12 about -- with us -- about filing a motion to suppress that
13 might involve challenging a search warrant. And I think that
14 to the extent that that is raised, it might be useful --

15 **THE COURT:** I did set that.

16 **MR. HEMANN:** Oh, I'm sorry.

17 **THE COURT:** I said motions to suppress and sever.

18 **MR. HEMANN:** Sever and suppress. I just didn't hear
19 that, Your Honor.

20 **THE COURT:** I think that's going to await both
21 further discovery, and I think then we'll know -- because I've
22 said the Bill of Particulars and the motion to dismiss, if any.
23 So we'll at least have the pleadings finalized in some fashion
24 in which the defendants are going first, et cetera. And then I
25 think it would be appropriate to have a suppression.

1 **MR. HEMANN:** I'm sorry, Your Honor. I didn't hear
2 Your Honor say suppress. I apologize.

3 **MR. FROELICH:** I heard Your Honor and everything. I
4 wasn't sure -- or will Your Honor notify us after you see the
5 pleas. One of the motions to suppress -- I'll attack the
6 search warrant, and that probably is not going to require an
7 evidentiary hearing. There may be one small issue, which I'm
8 still researching on the search warrant. But there will be as
9 to the statements, and I believe that would be an evidentiary
10 hearing. I just wanted to --

11 **THE COURT:** Fine. And what I would ask counsel to do
12 is list -- mention that in -- obviously request it, but I would
13 also like you to meet and confer with Government counsel to
14 figure out if the Court would allow such an evidentiary
15 hearing, what would be the contours of it; how many witnesses?
16 How long? Because then I may well specially set it, if it's
17 going to be an evidentiary hearing.

18 **MR. FROELICH:** I don't think it would be very long,
19 but I do believe it will be -- I'll put it in the motion,
20 Your Honor.

21 **THE COURT:** Right. And because if we're going to
22 need interpreters, there's lead time -- yeah, but the other
23 defendants may have a desire to -- the non-English-speaking may
24 have a desire -- they have a right to be there.

25 **MR. FROELICH:** That's fine. I understand.

1 **THE COURT:** So there's some logistics that need to --

2 **MR. FROELICH:** That's why I was bringing it up.

3 **THE COURT:** Anything, Mr. Hemann?

4 **MR. HEMANN:** Nothing from the Government, Your Honor.

5 **THE COURT:** Anything from the defense counsel?

6 **MR. GASNER:** Yes, Your Honor. Because the floodgates
7 of discovery have opened a bit, we have a lot of 302s the
8 Government has been kind enough to present. And it includes
9 material from DuPont that basically claims that everything
10 under the sun is a trade secret. Hundreds, if not thousands,
11 of documents claim to be trade secrets and the like. Only when
12 we get an expert report are we going to know what we really
13 need to try.

14 So my preparation is just hugely broader now, based on
15 what I've heard. The indictment alleges one really broad trade
16 secret and four really narrow ones. The discovery shows
17 potentially hundreds of things that they're going to assert.
18 And I think the expert report is probably the point at which
19 I'll really know what they're serious about and what I need to
20 address at the trial.

21 So I'd ask that the Court set a deadline for the
22 Government's expert reports as part of this first tranche of
23 deadlines.

24 **THE COURT:** Well, one of the first things I said was
25 if there's a dispute about the disclosure of experts, that's

1 within the scope of the referral to Judge Cousins.

2 **MR. GASNER:** Okay. I wasn't sure --

3 **THE COURT:** So he, as you saw -- and I will reconnect
4 with them, which will probably be overkill, but I will do it to
5 say he needs to give this fairly high priority.

6 **MR. GASNER:** Fantastic. Thank you.

7 **THE COURT:** So you'll get priority on his calendar, I
8 can assure you.

9 Yes?

10 **MR. FROELICH:** Your Honor, would you have any idea,
11 Your Honor, not when you're going to -- not the trial date
12 you're going to set, but when you would set the date?

13 **THE COURT:** Yes. My intention would be in or around
14 July when we have the -- because that will be the last set of
15 motions. We'll know who's in, who's out, who's severed, who's
16 going to trial, what the contours of the trial look like. And
17 at that point, either right at that time or in the order with
18 respect to -- you know, if it comes out of that. I'm going to
19 set a trial date.

20 Now, when that will be -- given the period of time that I
21 think is necessary for *Daubert* motions and to have a more
22 robust trial conference in a case of this complexity, it's not
23 going to be, like, the next month. We need -- if you think
24 about it, there are these 30-day periods that we're going to
25 have to have for hearings and pretrial and in limines and all

1 that kind of thing.

2 And so I would say that this summer I'll be setting a
3 trial date for some time that is reasonably related to the
4 Court's schedule, counsel's schedule, and the -- what has to be
5 done, but I'm not going -- it's not going to be very long.

6 It's going to be the minimum amount of time necessary to
7 do the things that this case requires and this Court's standing
8 order requires with respect to pretrial conference and trying
9 cases. So don't get your schedules too busy -- you can figure
10 it out. You can sit down with a calendar and say, "Well, if
11 the judge sets it on July 25th, we have to do" -- and you look
12 at my order and you add some days because I'm going to give you
13 a more relaxed pretrial for yours and our benefit. You could
14 pretty much figure out the earliest time that this case could
15 go to trial.

16 **MR. FROELICH:** I was asking because I have another
17 major case where the Court and the Assistant U.S. Attorneys
18 have said, "We'll work with you on this one. There's no
19 pressure on that." So I was just trying to give them a date
20 when I can give them a date.

21 **THE COURT:** You can talk to Mr. Hemann and
22 Mr. Axelrod. They're very powerful people in the office.

23 **MR. FROELICH:** It's not here, Your Honor. It's in
24 Macon, Georgia.

25 **THE COURT:** I don't think their power goes that far.

EXHIBIT B

From: Hemann, John (USACAN) [<mailto:John.Hemann@usdoj.gov>]
Sent: Wednesday, May 08, 2013 1:43 PM
To: Simona A. Agnolucci; Axelrod, Peter (USACAN)
Cc: Stuart L. Gasner; Katherine M. Lovett
Subject: Re: United States v. Liew: Joint Stipulation re Letter Briefs

Simona -

We're thinking that we should not decide on the expert disclosure schedule until Judge White decides the motions and selects a trial date. Given the motions that have been and will be filed, and the lack of a trial date, it doesn't make sense to start working on expert reports yet.

Our potential expert opinions are going to be directly impacted by Judge White's decisions on the motions. And, given the motions and the exhibit designation deadline, we won't be able to get to the experts until after these items are wrapped up.

John

From: Simona A. Agnolucci [<mailto:SAgnolucci@kvn.com>]
Sent: Wednesday, May 08, 2013 04:34 PM Eastern Standard Time
To: Hemann, John (USACAN); Axelrod, Peter (USACAN)
Cc: Stuart L. Gasner <SGasner@KVN.com>; Katherine M. Lovett <KLovett@kvn.com>
Subject: RE: United States v. Liew: Joint Stipulation re Letter Briefs

John and Pete,

I am checking back in about the stipulation. We need to resolve this issue in short order, among other things so that we can give our expert sufficient notice to plan for his report. If you are willing to agree that his report be due 60 days after yours is submitted on July 1, then that will save us having to work out a stipulation and file letter briefs. If, however, you continue to take the position that his report should be due sooner, please let me know right away (and provide your suggested edits to the stipulation). If we don't hear from you, we will need to file a motion with Judge Cousins, which we would rather not do.

Thanks,
Simona

From: Simona A. Agnolucci
Sent: Monday, May 06, 2013 3:20 PM
To: 'Hemann, John (USACAN) (John.Hemann@usdoj.gov)'; 'Axelrod, Peter (USACAN) (Peter.Axelrod@usdoj.gov)'
Cc: Stuart L. Gasner; Katherine M. Lovett
Subject: RE: United States v. Liew: Joint Stipulation re Letter Briefs

John and Pete,

I don't think we ever heard back from you on our proposed stipulation regarding letter briefs addressing the schedule for Rule 16 expert disclosures. Can you please let me know by the end of tomorrow if you consent to filing the attached? It is the same document I sent you on April 22, except that we have now pushed out the proposed letter briefing schedule by one week.

Thanks,
Simona

From: Simona A. Agnolucci
Sent: Monday, April 22, 2013 3:13 PM
To: Hemann, John (USACAN) (John.Hemann@usdoj.gov); Axelrod, Peter (USACAN) (Peter.Axelrod@usdoj.gov)
Cc: Stuart L. Gasner; Katherine M. Lovett
Subject: United States v. Liew: Joint Stipulation re Letter Briefs

John and Pete,

Attached is a draft stipulation regarding the letter briefs we discussed submitting to Judge Cousins addressing the schedule for our Rule 16 expert disclosures. Please let me know if you have any revisions.

Thanks,
Simona

Simona A. Agnolucci
Attorney at Law

KEKER & VAN NEST LLP

415 676 2259 direct | [vCard](#) | sagnolucci@kvn.com
633 Battery Street, San Francisco, CA 94111-1809 | 415
391 5400 main | kvn.com

EXHIBIT C

From: Hemann, John (USACAN) [mailto: [REDACTED]]
Sent: Thursday, May 30, 2013 9:13 PM
To: Simona A. Agnolucci; Stuart L. Gasner; Doron Weinberg; Jerry Froelich
Cc: Axelrod, Peter (USACAN)
Subject: Rule 16 Letter

Counsel:

Attached is our Rule 16 disclosure letter and two Excel attachment, Attachments A and C.

Hard copies of the letter and enclosures will follow tomorrow – we had some computer issues today. We will hand deliver to Kecker and Doron, and Fed Ex to Jerry.

Thanks,

John

John H. Hemann
Assistant U.S. Attorney
450 Golden Gate Avenue
San Francisco, California 94102
[REDACTED]



*United States Attorney
Northern District of California*

*11th Floor, Federal Building
450 Golden Gate Ave., Box 36055
San Francisco, CA 94102-3495*

*(415)436-7200
FAX: (415) 436-7234*

June 14, 2013

Simona Agnolucci
Stuart Gasner
Keker & Van Nest
633 Battery Street
San Francisco, California 94111

Doron Weinberg
523 Octavia Street
San Francisco, California 94102

Jerry Froelich
McKenney & Froelich
1349 West Peachtree Street
Two Midtown Plaza, Suite 1250
Atlanta, Georgia 30309

Re: *United States v. Walter Liew, et al.*, Case No. CR-11-0573-JSW

Counsel:

This letter constitutes our identification of items the government intends to use in its case-in-chief at trial, pursuant to Fed. R. Crim. P. 16(a)(1)(E)(ii) and the Court's order. The items we are identifying are those that are currently "within the government's possession, custody, or control," as provided by Rule 16(a)(1)(E). Our investigation and trial preparation are continuing and we expect that we will obtain additional items, including in connection with expert reports, which we will provide to you.

This production assumes that the government will be required to prove every element of every offense alleged in the Second Superseding Indictment, and that each element will be contested by one or more defendants. As such, it includes "literally" each and every item we have identified that we believe tends to prove the offenses charged (including knowledge and intent) and is likely substantially more evidence than actually will be introduced, given the way issues are narrowed and agreements reached in the weeks leading up to the actual trial.

United States v. Liew, et al.

May 30, 2013

Page 2

Because the documents exist in different places within our record-keeping system and/or were located in multiple locations or different searches, there are many duplicates among the documents we are identifying. The documents identified herein are narrowed from a total of over 55 million electronic and paper copy documents we have produced in discovery.

We are identifying the following items that we intend to use in our case-in-chief at trial:

1. On April 17, 2013, we provided you with a set of "key documents." On May 16, 2013, we produced a set of tax records and documents. We intend to use each of the documents provided in these two productions in our case-in-chief at trial.
2. Each of the trade secret documents specifically identified as Trade Secrets 2-5 in the Second Superseding Indictment will be used in our case-in-chief.
3. Enclosed are documents recently obtained from DuPont that we intend to introduce in our case-in-chief at trial. The documents bear Bates numbers DUP1888-2116.
4. We intend to offer at trial the complaint and answer filed in the civil case filed by DuPont against Mr. Liew and USAPTI. We also intend to offer the plea agreement between the United States and Tze Chao. These documents are available on PACER.
5. We intend to offer the following documents, copies of which are enclosed with this letter, including: the August 7, 2010, anonymous letter to DuPont; the December 14, 2011, Christmas card from the Liewes to Timothy Spittler; the January 30, 1999, fax from Bob Maegerle to Walter Liew; and the May 24, 1996, letter from Bob Maegerle to Dennis Dakin.
6. We intend to offer in our case-in-chief the documents attached to the Declaration of Andrew Szamosszegi, Dkt. 124 (April 19, 2012).
7. Attachments A, B, C, and D identify documents and groups of documents we intend to introduce in our case-in-chief. Some of these documents will be introduced in summary form pursuant to Fed. R. Evid. 1006.
 - a. Attachment A is an Excel spreadsheet containing a list of items we intend to use in our case-in-chief. Most of the documents are identified by file path, so you can locate them on your computer system. Physical items are identified by name and you may examine them at the FBI at your convenience. Attachment A will be produced to you in electronic and paper form.
 - b. Attachment B is a DVD containing approximately 1,704 pdf files of documents that we intend to use in our case-in-chief. These documents are from various electronic sources.

United States v. Liew, et al.

May 30, 2013

Page 3

- c. Attachment C is an Excel spreadsheet identifying the financial institution accounts that we will be introducing at trial. The documents included in these accounts will be introduced either individually or in summary form in our case-in-chief. We anticipate that, absent likely stipulations, full accounts will need to be summarized and introduced into evidence.
 - i. In addition, the documents enclosed with this production in the folder "Financial Records," will be introduced in our case-in-chief. These documents include summaries of some of the financial evidence we anticipate we will offer at trial, albeit in different form. These summaries are offered to further identify certain of the documents on which we will rely. These documents have all been produced and also may be located in the electronic financial records or at the file-paths indicated on the documents.
 - d. Attachment D is a DVD identifying 1,708 electronic documents that we intend to use in our case-in-chief.
8. Attachment E is a DVD that contains 3,705 pdf files that contain documents we intend to offer in our case in chief at trial, many in summary form (for example, collections of business cards located in the search of the Liew's residence). These pdf files consist of *groups* of documents that were scanned from the hard-copy documents seized in the various searches by the FBI; the locations from which the documents were seized are identified. The specific documents from within these groups that we intend to use at trial are tagged in the hard-copy boxes stored in the FBI office in Palo Alto and are available now for your review. This is original evidence, including large print-outs and binders. This method of identification is necessitated by the way in which the documents have been maintained; we will be further isolating the individual documents over the next several weeks for the purposes of trial display, and will provide the product to you when it is completed.
9. Enclosed at Attachment H is a DVD containing 102 documents recovered from the search of the email [REDACTED]. A disc containing the entire email account and a copy of the search warrant and search warrant application will be produced separately.
10. Attachment F is a DVD listing 3,077 Chinese language documents, the translations of which are pending. We expect to further limit these documents and will provide you with an updated list.
11. Attachment G is a DVD listing 259,617 documents including .dwg files from the computers of Robert Maegerle and Hou Shendong, and electronic documents that we have identified through key word searches. We expect that some of these documents will

United States v. Liew, et al.

May 30, 2013

Page 4

be the subject of expert testimony and will be included in summary exhibits. We expect to further limit these documents and will provide you with an updated list.

12. We are in the process of preparing English translations of Chinese documents for use at trial.
 - a. Enclosed with this letter is a DVD labeled Attachment I which contains 126 FBI translations of documents we intend to use at trial. We are producing those translations in our possession that are FBI "verbatim translations," in other words translations that are substantially complete and that we believe would be admissible at trial. We intend to further review these and assume that they will be modified somewhat before trial.
 - b. We do not have verbatim translations of all of the Chinese language documents that are identified herein. As additional verbatim translations are completed, we will produce them to you on a rolling basis. We are not at this time producing summary translations because those are not documents we intend to offer at trial.

We suggest a call to discuss this in more detail. Please let us know when next week you will be available.

Very truly yours,

MELINDA HAAG
United States Attorney

/s/

JOHN H. HEMANN
PETER B. AXELROD
Assistant United States Attorneys

Attachment C with redactions

Attachment C
 Rule 16(a)(1)(E)(ii) Designation

Item	Account Name	Financial Institution	Account Type	Account Number
	Christina H Liew	Bank of America	Prima Interest Checking	Account Number
			Balance Rewards MM	Account Number
			Investment CD	Account Number
			4 Mo. Featured CD	Account Number
			MyAccess Checking	Account Number
			Regular Savings	Account Number
1	Walter Lianheen Liew Christina H Liew	Bank of America		
2			Business Checking	Account Number
3	Performance Group USA Inc	Bank of America	Business Interest Maximizer	Account Number
4	Performance Group USA Inc	Bank of America		Account Number
5	Walter Liew	Bank of America		Account Number
6	Various	Bank of China	Wire Transfers	Account Number
7	Qiao Hong	Bank of China		Account Number
8	Christina Hong Qiao Liew	Bank of China		Account Number
9	Christina Hong Qiao Liew	Bank of China		Account Number
10	[REDACTED]	Bank of China		Account Number
11	Qiao Hong	Bank of China		Account Number
12	Qiao Hong	Bank of China		Account Number
13	Walter Lianheen Liew	Bank of China		Account Number
14		Bank of East Asia	Super YLD Savings	Account Number
15	Christina Hong Qiao Liew	Bank of East Asia	NOW Checking	Account Number
16	Performance Group (USA), Inc.	Bank of East Asia	NOW Checking	Account Number
17	[REDACTED]	California Pacific Bank	Checking	Account Number
18	[REDACTED]	California Pacific Bank	Demand Deposit/Checking	Account Number
19	USA Performance Technology Inc	California Pacific Bank	Investor Checking/NOW Checking	Account Number
20	Performance Group (USA) Inc	California Pacific Bank	Demand Deposit/Checking	Account Number
21	Performance Group (USA) Inc	Cathay Bank	Basic Business Checking	Account Number
22	Performance Group (USA), Inc.	Cathay Bank	Smart Business Account Checking	Account Number
23	Christina H Liew Christina H Liew	Citibank	Certificate of Deposit	Account Number
		Citibank	Interest Checking Money Market Plus	Account Number
			Checking	Account Number
			3 Month CD	Account Number
			6 Month CD	Account Number
24				

Attachment C

Rule 16(a)(1)(E)(ii) Designation

25	Christina H Liew	Citibank	High Interest Checking	Account Number:
	Walter Lianheen Liew	Citibank		Account Number:
26	Christina Hong Qiao Liew	Citibank	Saving Account	Account Number:
27	USA Performance Technology, Inc	Citibank	Checking	Account Number:
28	USA Performance Technology, Inc	Chinese Banking Corporation Limited		Account Number:
29	ESI Equipment and Engineering Pte Ltd.	Comerica	Business Money Market	Account Number:
30	Walter Lianheen Liew			
	[Redacted] Trustee			
31	Huadong Equipment Solutions Pte Ltd	DBS Bank Ltd, Singapore		Account Number:
32	Huadong Equipment Solutions Pte Ltd	DBS Bank Ltd, Singapore		Account Number:
33	[Redacted]	East West Bank	Contributory IRA	Account Number:
34	[Redacted]	East West Bank	Contributory IRA	Account Number:
35	[Redacted]	East West Bank	Certificate Of Deposit	Account Number:
36	[Redacted]	East West Bank	Certificate Of Deposit	Account Number:
37	[Redacted]	East West Bank	Certificate Of Deposit	Account Number:
38	Christina H Liew	East West Bank	Checking	Account Number:
39	Christina H Liew	East West Bank	Certificate Of Deposit	Account Number:
40	Christina H Liew	East West Bank	Money Market Checking	Account Number:
41	Christina H Liew	East West Bank	Money Market Checking	Account Number:
42	USA Performance Technology Inc.	East West Bank	Non-Personal Bonus MM Checking	Account Number:
43	USA Performance Technology Inc.	East West Bank	Standard Business Checking	Account Number:
44	[Redacted]	East West Bank	Value Checking	Account Number:
45	[Redacted]	HBSC	Premier account	Account Number:
46	Walter Lian-Heen Liew	HBSC	Premier account	
47	Huadong Equipment Solutions Pte. Ltd.	HBSC		N/A
	Performance Group (USA) Inc	Mega International Commercial Bank		
48	USA Performance Technology Inc.	TD Waterhouse	Stocks	Account Number:
49	[Redacted]	TD Waterhouse	Money Market Fund; Stocks	Account Number:
50	[Redacted]			Account Number:

Attachment C
Rule 16(a)(1)(E)(ii) Designation



Account Number:
Account Number:
Account Number:
Account Number:
Account Number:
Account Number:
Account Number:
Account Number:

Checking
Elite Money Market
Certificate of Deposit
Credit Card
Custom Checking
Savings
Savings
Savings

US Bank
US Bank
Wells Fargo
Wells Fargo
Wells Fargo
Wells Fargo
Wells Fargo
Wells Fargo
Wells Fargo

51 Christina H Q Liew
52 Christina H Q Liew
53 Christina Hong Qiao Liew
54 Christina Hong Qiao Liew
55 Christina Hong Qiao Liew
56 Christina Hong Qiao Liew
57 Christina Hong Qiao Liew
58 Christina Hong Qiao Liew

59 A Minor By Christina Hong Qiao Liew

Excerpts of Attachment D

Evidence Group	SVRCFL Evidence #	Item Code	Description	From Search Location
P	SVE034297	Hard Drive	Seagate hard drive L1CC1 Server	Oakland Site
U	SVE034298	Hard Drive	Seagate hard drive L1IC1H1	Oakland Site
U	SVE034299	Hard Drive	Seagate hard drive L1IC1H2	Oakland Site
V	SVE034301	Hard Drive	Hitachi hard drive L1IC3H1	Oakland Site
N	SVE034302	Hard Drive	Seagate hard drive L1IC4H1	Oakland Site
N	SVE034303	Hard Drive	Seagate hard drive L1IC4H2	Oakland Site
X	SVE034305	Hard Drive	Seagate hard drive L1KH1 (loose drive)	Oakland Site
R	SVE034306	Hard Drive	Seagate hard drive L1KC1H1	Oakland Site
P	SVE034309	Hard Drive	Maxtor hard drive L1LC2H2	Oakland Site
W	SVE034311	Hard Drive	Seagate hard drive L1LC1H1	Oakland Site
T	SVE034312	Hard Drive	Seagate hard drive L1IC2	Oakland Site
Q	SVE034313	Hard Drive	Seagate hard drive L1LC3H1	Oakland Site
S	SVE034314	Hard Drive	Seagate hard drive L1MC1H1	Oakland Site
P	SVE034315	Hard Drive	Seagate hard drive L1QC1H1	Oakland Site
O	SVE034317	Hard Drive	Western Digital hard drive L1SC2H1	Oakland Site
R	SVE034319	Hard Drive	Western Digital hard drive L1SC1H2	Oakland Site
R	SVE034320	Hard Drive	Western Digital hard drive L1SC1H1	Oakland Site
P	SVE034322	Hard Drive	Western Digital hard drive L1BC1H1	Oakland Site
D	SVE034329	Hard Drive	WD Caviar 26400	Orinda: 2 Crown Ct
M	SVE034330	Hard Drive	WD External HDD (Attached to Server)	Oakland Site
G	SVE034332	Hard Drive	WD HDD from SVE034294	Safety Deposit Box
H	SVE034353	Removable	SanDisk 8GB	Safety Deposit Box
H	SVE034354	Removable	SanDisk 4GB	Safety Deposit Box
H	SVE034355	Removable	AIGO	Safety Deposit Box
H	SVE034356	Removable	Sony 256MB Flash Drive	Safety Deposit Box
H	SVE034357	Removable	SanDisk Magic Gate	Safety Deposit Box
H	SVE034358	Removable	SanDisk Magic Gate	Safety Deposit Box
H	SVE034359	Removable	SanDisk Magic Gate	Safety Deposit Box
H	SVE034360	Removable	SanDisk Cruzer 4GB	Safety Deposit Box
H	SVE034361	Removable	SanDisk Cruzer 4GB	Safety Deposit Box
H	SVE034363	Removable	Kingston Data Traveler 4GB	Safety Deposit Box
H	SVE034364	Removable	JetFlash 512MB	Safety Deposit Box
L	SVE034365	Removable	Maxell 4GB	Orinda: 2 Crown Ct
L	SVE034366	Removable	SanDisk 4GB	Orinda: 2 Crown Ct
L	SVE034367	Removable	SanDisk Flash Drive	Orinda: 2 Crown Ct
L	SVE034368	Removable	SanDisk Cruzer Edge 8GB	Orinda: 2 Crown Ct
L	SVE034369	Removable	Sony USB drive - Gray	Orinda: 2 Crown Ct
L	SVE034370	Removable	Memory Stick	Orinda: 2 Crown Ct
L	SVE034372	Removable	Memory Stick - Sony 32 GB	Orinda: 2 Crown Ct
L	SVE034373	Removable	Memory Stick - Sony 256 MB	Orinda: 2 Crown Ct
E	SVE034409	Hard Drive	Hitachi HDD from SVE034325	Orinda: 2 Crown Ct
C	SVE034491	Hard Drive	Seagate HDD from SVE034326	Orinda: 2 Crown Ct
AE	SVE035862	Hard Drive	HP Pocket Media Drive	Robert Maegerle
AE	SVE035863	Hard Drive	HP Drive Bob-PC	Robert Maegerle
AE	SVE035864	Hard Drive	Toshiba Laptop	Robert Maegerle
AE	SVE035865	Hard Drive	Desktop	Robert Maegerle
AE	SVE035866	USB Drive	Robert Maegerle	Robert Maegerle

Path	Item #
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/RX723-OxidationReactor-30k Rev B.pdf	254014
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/sample detail.jpg	254015
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/TECHNOLOGY PACKAGE/START UP AND SHUT DOWN PROCEDURES.doc	254062
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc1.dwg	733511
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc2.dwg	733831
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc3.dwg	733843
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc4.dwg	733868
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc5.dwg	733910
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc6.dwg	733922
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/RECYCLER/S-1-5-21-3888190022-2544031056-968938642-1005/Dc7.dwg	733932
sve035863.E01/Partition 2/HP [NTFS]/[root]/System Recovery Files/2010-05-17 200948/C/Users/BOB/P&ID's/Comments From/BI Meeting Memorandum 2009.12.doc	910936
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0001.jpg	4120012
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0002.jpg	4120013
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0003.jpg	4120014
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0004.jpg	4120015
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0005.jpg	4120016
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0007.jpg	4120017
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0008.jpg	4120018
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0009.jpg	4120019
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/120 MT_0010.jpg	4120020
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0004.jpg	4120021
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0005.jpg	4120022

sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0007.jpg	4120023
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0010.jpg	4120024
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0011.jpg	4120025
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0012.jpg	4120026
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0013.jpg	4120027
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0014.jpg	4120028
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0015.jpg	4120029
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0016.jpg	4120030
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0017.jpg	4120031
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0018.jpg	4120032
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0019.jpg	4120033
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0020.jpg	4120034
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0021.jpg	4120035
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0022.jpg	4120036
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0023.jpg	4120037
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0025.jpg	4120038
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0026.jpg	4120039
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0027.jpg	4120040
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0028.jpg	4120041
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0029.jpg	4120042
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0030.jpg	4120043
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0031.jpg	4120044
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0032.jpg	4120045

sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0033.jpg	4120046
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0036.jpg	4120047
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0037.jpg	4120048
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0038.jpg	4120049
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0039.jpg	4120050
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/30 MT_0040.jpg	4120051
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0001.jpg	4120052
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0002.jpg	4120053
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0003.jpg	4120054
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0004.jpg	4120055
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0005.jpg	4120056
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0006.jpg	4120057
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0007.jpg	4120058
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0008.jpg	4120059
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0009.jpg	4120060
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0010.jpg	4120061
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0011.jpg	4120062
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0012.jpg	4120063
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0013.jpg	4120064
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0014.jpg	4120065
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0015.jpg	4120066
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0016.jpg	4120067
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0017.jpg	4120068

sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0018.jpg	4120069
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0019.jpg	4120070
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0020.jpg	4120071
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/PLANT PICS/85 MT_0021.jpg	4120072
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/100K Chlorinator Drawing List Index.pdf	765612
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/100K CHLORINATOR MANIFOLD ES-004-R300-2- 01 to 06.pdf	765613
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/100K Chlorinator Structural Drawings ES-004- R300-4-01 to 09.pdf	765614
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/100k Rev Framing.pdf	765615
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/ES-004-R3000-1-01 to 06 Details.pdf	768553
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Users/BOB/AppData/Local/Temp/OX100K_Main_ASM_REV03.pdf	768959
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0001.jpg	4089047
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0002.jpg	4089048
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0003.jpg	4089049
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0004.jpg	4089050
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0005.jpg	4089051
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0007.jpg	4089052
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0008.jpg	4089053
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0009.jpg	4089054
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/120 MT_0010.jpg	4089055
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0004.jpg	4089056
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0005.jpg	4089057
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0007.jpg	4089058
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0010.jpg	4089059
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0011.jpg	4089060
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0012.jpg	4089061
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0013.jpg	4089062

sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0014.jpg	4089063
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0015.jpg	4089064
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0016.jpg	4089065
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0017.jpg	4089066
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0018.jpg	4089067
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0019.jpg	4089068
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0020.jpg	4089069
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0021.jpg	4089070
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0022.jpg	4089071
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0023.jpg	4089072
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0025.jpg	4089073
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0026.jpg	4089074
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0027.jpg	4089075
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0028.jpg	4089076
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0029.jpg	4089077
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0030.jpg	4089078
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0031.jpg	4089079
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0032.jpg	4089080
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0033.jpg	4089081
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0036.jpg	4089082
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0037.jpg	4089083
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0038.jpg	4089084
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0039.jpg	4089085
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/30 MT_0040.jpg	4089086
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0001.jpg	4089087
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0002.jpg	4089088
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0003.jpg	4089089
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0004.jpg	4089090
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0005.jpg	4089091
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0006.jpg	4089092
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0007.jpg	4089093
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0008.jpg	4089094
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0009.jpg	4089095
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0010.jpg	4089096
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0011.jpg	4089097
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0012.jpg	4089098
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0013.jpg	4089099
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/FLOWSHEETS FROM WALTER/OxidationPFD.jpg	4120275
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/FLOWSHEETS FROM WALTER/ChlorinationPFD.jpg	4120276
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/FLOWSHEETS FROM WALTER/OxidationPFD.PDF	4120278
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/FLOWSHEETS FROM WALTER/ChlorinationPFD.PDF	4120281

sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/BOB-PC/Backup Set 2011-07-17 202448/Backup Files 2011-07-17 202448/Backup files 2.zip/C/Users/BOB/Downloads/100K Chlorinator H55-0252(20101028).pdf	2096678
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/BOB-PC/Backup Set 2011-07-17 202448/Backup Files 2011-07-17 202448/Backup files 2.zip/C/Users/BOB/Downloads/Flow Rates Chlorination with Sampled Values.pdf	2096728
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/BOB-PC/Backup Set 2011-07-17 202448/Backup Files 2011-07-17 202448/Backup files 2.zip/C/Users/BOB/Downloads/OxidationReactor_R5500.pdf	2096763
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/Pangang/2008_09_09/100T Gen.jpg	4092724
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/Pangang/2008_09_09/100T Rx.jpg	4092725
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/Pangang/2008_09_07/Plot PI Sh 1.jpg	4092728
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/Pangang/2008_09_07/Plot PI Sh 2.jpg	4092729
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0014.jpg	4089100
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0015.jpg	4089101
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0016.jpg	4089102
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0017.jpg	4089103
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0018.jpg	4089104
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0019.jpg	4089105
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0020.jpg	4089106
sve039311_e01_image.E01/Partition 1/Cruzer [FAT32]/[root]/PLANT PICS/85 MT_0021.jpg	4089107
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_20/IMG.JPG	4090803
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_20/PDI3.JPG	4090804
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_17/Cond Head.jpg	4090807
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_17/Factors.jpg	4090808
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_08/CI2-sh1.jpg	4090811
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_10_08/CI2-sh2.jpg	4090812
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_06/conv arrgt.jpg	4090821
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_04/Elev.jpg	4090824
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_04/Grd Plan.jpg	4090825
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_04/Pond.jpg	4090826
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_04/Upper Flr.jpg	4090828

sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_02/Rx Elev sh 1.jpg	4090830
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_02/Rx plan sh 1.jpg	4090831
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_02/Rx-P Elev sh 2.jpg	4090832
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_09_02/Rx-P plan sh2.jpg	4090833
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_29/pipe spec 1.jpg	4090838
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_29/pipe spec 2.jpg	4090839
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_29/pipe spec 3.jpg	4090840
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_29/Scrubbers.jpg	4090841
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_24/Flash Tk.jpg	4090844
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_24/P Col.jpg	4090845
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_21/Cond Tks.jpg	4090848
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_21/Crude Tks.jpg	4090849
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_20/No2 CC.jpg	4090852
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_19/No 1 CC.jpg	4090855
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_18/SR Tank.jpg	4090858
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_17/NR Cyclone.jpg	4090861
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_16/SR Cond.jpg	4090864
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_14/pond 1.jpg	4090867
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_14/pond 2.jpg	4090868
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_10/vent systems.jpg	4090872
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_08_06/Fume Disposal.jpg	4090874
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_19/Reactor O2 Nozzle 1.jpg	4090877
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_19/Reactor O2 Nozzle 2.jpg	4090878

sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_17/Rx Slot.jpg	4090881
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_13/layout sh1.jpg	4090884
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_13/layout sh2.jpg	4090885
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_13/layout sh3.jpg	4090886
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_04/CD Chlor.sh1.jpg	4090889
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_04/CD chlor.sh2.jpg	4090890
sve039310_e01_image.E01/Partition 1/NONAME [FAT32]/[root]/My Pictures/MP Navigator/2009_07_04/CD chlor.sh3.jpg	4090891
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Backup Files/1/1/V0/C/Users/BOB/P&ID's/100K TiO2 PFD Complete Set 112009.pdf	104843
sve035862.E01/Partition 5/HP Pocket Media Drive [NTFS]/[root]/Backup Files/1/1/V0/C/Users/BOB/PFD's/100K TiO2 PFD Complete Set 112009.pdf	104849
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/Info for Kick-off Meeting of Jinzhou Project/Chloride_TiO2_Process.doc	248376
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/Info for Kick-off Meeting of Jinzhou Project/TECHNOLOGY PACKAGE/Chloride TiO2 Process.doc	248387
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/Kick-off Meeting Jinzhou 2008-01/FATY ACID SPECIFICATIONS.doc	248400
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/Kick-off Meeting Jinzhou 2008-01/General spec from Bob.pdf	248401
sve035864.E01/Partition 1/SQ003680 [NTFS]/[root]/Documents and Settings/Robert Maegerle/My Documents/OxidationReactor_R5500_INSULATOR RFQ.pdf	248963
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Level Tank/level tk sh 3.jpg	4086133
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Purif Col/manifold.jpg	4086138
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Purif Col/manifold2.jpg	4086139
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Purif Col/manifold3.jpg	4086140
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Manifold/manifold xs.jpg	4086147
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Manifold/spiral.jpg	4086148
sve039312_e01_image.E01/Partition 1/NONAME [FAT16]/[root]/Manway/manway.jpg	4086151
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/Oxid. Data/2008_02_16/Calcs-sh1.jpg	4120334
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/Oxid. Data/2008_02_16/Calcs-sh2.jpg	4120335
sve039308_e01_image.E01/Partition 1/TravelDrive [FAT16]/[root]/Oxid. Data/2008_02_16/Calcs-sh3.jpg	4120336
sve039307_e01_image.E01/Partition 1/KODAK [FAT16]/[root]/DCIM/100CASIO/CIMG0916.JPG	4128010

Excerpts of Attachment G

Path	Item #
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/çj«é...æ³•ä,"â^©/4183768/United States Patent	11515
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/GB553135ç.....çšæ'~è .htm	11534
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/Seed for production of rutile titanium	11568
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/æ"ç>âCE...è+œç"ÿä°šèèâ€™æ€šè#ç°ççÿ³é'>ç™½.htm	11575
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/æ"ç>âCE...è+œç"ÿä°šèèâ€™æ€šè#ç°ççÿ³é'>ç™½æ'~è .htm	11576
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/æ"ç²°ãžâ^¶é€æµ+æ-™.htm	11579
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/æ"ç²°ãžâ^¶é€æµ+æ-™æ-fæ-#.htm	11580
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç>~/ã¼~ç>>ä,œçš,,æ-#ä»¶/æ,é'>ç™½â·¥ä½œè°ã½•/æ-#çCE®èµ,,æ-™/æ-šæ'²ä,"â^©/é€ç°ç"é'>ç™½æµ+æ-™æ-fæ-#.htm	11582
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12202
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12204
05USSCY32PGJZ185 2006-Unlocked/Raw Materials and Utilities Requirements/Raw Material and Utilities Unit Requirements June 2006.doc	12204
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12217
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12238
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12240
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12270
sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/æ°-âCE-æ³•é'>ç™½æš€æœ-èµ,,æ-™ç--ä,%%æ%°¹æ³çâ-CEé-æ-æ²,è...¼æ°-âCE-âÿ°æœ-è°¼è°i/BASIC ENGINEERING ISSUED FOR CONTRACT	12292
05USSCY32PGJZ185 2006-Unlocked/Equipment Specificationsè°¼â#âÿ°æœ-è°¼è°i/Master_Equipment_TiCl4 with newpowerloads	9039
sve034263 Unencrypted Portion.E01/Partition 1/â•¶µâ•©Ã³â•çÂ½2 [FAT16]/[root]/ã¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/News of TZMI 10.11.doc	9040
sve034263 Unencrypted Portion.E01/Partition 1/â•¶µâ•©Ã³â•çÂ½2 [FAT16]/[root]/ã¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/News of TZMI 10.18.doc	9040

sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.htm	9041
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/Welcome to TZMI News for the week commencing November 15.doc	9042
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/Welcome to	9043
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldapapp.htm	9045
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.htm	9046
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/newtop.htm	9047
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	9051
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp.htm	9052
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	9097
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	9099
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	9208
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	10323
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	10442
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15256
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15260
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15261
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15278
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15291
sve034263 encrypted.E01/Partition 1/Security [FAT32]/[root]/é#è æ-#ä»¶/Dç~/ä¼~ç>>ä,œçš,,æ-#ä»¶/records/other/News of TZMI/NEWS OF TZMI2.files/ldmsapp.files/ldmsapp(1).htm	15297
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/BI submitted to PIETC/(æ°CE). ç”µæ””ã€ä»èì”ã°CEè#æžš Electrical Instruments and Control/é©-è¼æ, ...ã• Motor List/Preliminary Motor List.pdf	17901
sve034263 Unencrypted Portion.E01/Partition 1/â•†µâ•†©Ã³â•†ĈÂ½2 [FAT16]/[root]/BI submitted to PIETC/(æ°CE). ç”µæ””ã€ä»èì”ã°CEè#æžš Electrical Instruments and Control/è”è-è¼ç°— Electrical Loads/è”è-è¼ç°— .pdf	17903

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă°Ĉ). ċ”ıæ””ăă»èj”ă’Ĉè†æŽš Electrical Instruments and Control/ăŽšă^Ÿċ³»ċ»Ÿé...ċ½”ă»¼ Control System Overview/CS-000-005 Layout1 (1).pdf 17905

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă°Ĉ). ċ”ıæ””ăă»èj”ă’Ĉè†æŽš Electrical Instruments and Control/ăŽšă^Ÿċ³»ċ»Ÿé...ċ½”ă»¼ Control System Overview/CS-000-010 Layout1 (1).pdf 17906

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă°Ĉ). ċ”ıæ””ăă»èj”ă’Ĉè†æŽš Electrical Instruments and Control/ăŽšă^Ÿċ³»ċ»Ÿé...ċ½”ă»¼ Control System Overview/CS-000-011 Layout1 (1).pdf 17907

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă°Ĉ). ċ”ıæ””ăă»èj”ă’Ĉè†æŽš Electrical Instruments and Control/ăŽšă^Ÿċ³»ċ»ŸăšŸëf/žè~æ~Ž Control System Architecture/100K Control System Architecture.pdf 17909

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă°Ĉ). ċ”ıæ””ăă»èj”ă’Ĉè†æŽš Electrical Instruments and Control/IOċ,†æ•°é† IO Counts/100K_IO_counts.pdf 17911

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,‰). ă...Ÿă»– OTHERS/ċ¼–ċ ċ³»ċ»Ÿè~æ~Ž Tagging and Numbering System/TAGGING AND NUMBERING SYSTEM.pdf 17914

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,‰). ă...Ÿă»– OTHERS/ċ°jé“ċ»¼ă”ææ–™èj” Piping Materials Summary/Piping Material Summary.pdf 17916

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,‰). ă...Ÿă»– OTHERS/ă»¼ă¼ă¼ LEGENDS/USAPTI Legend Sheet LS-001 to LS-007.pdf 17918

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/9. ă°‰ă...”ă«ċ”Ÿăšëš,ëf½ăžăæ–½ Safety and Hygiene/Safety Guidelines.pdf 17921

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/8. æ±jæŸ”æ°ċ,†ăšæ±jæŸ”ă»è”ċ»„æ^ċ‰°é†/ISBL Waste Summary.pdf 17923

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/8. æ±jæŸ”æ°ċ,†ăšæ±jæŸ”ă»è”ċ»„æ^ċ‰°é†/ă°æŸ²æ±½ă½”ăž’æ”¼.pdf 17924

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/7. ăžŸè¼...ææ–™ăšă...–ċ””ă•Ÿċ”æŸ^èĈ–èj” Raw Material and Utilities Summary/Raw Material and Utility Summary.pdf 17926

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/7. ăžŸè¼...ææ–™ăšă...–ċ””ă•Ÿċ”æŸ^èĈ–èj” Raw Material and Utilities Summary/Utilities Summary and Waste For Pangang.pdf 17927

sve034263 Unencrypted Portion.E01/Partition 1/â•Ÿıâ•©Ă³â•ĈĂ½2 [FAT16]/[root]/BI submitted to PIETC/(ă,Ĉ). ă•Ÿè‰° PROCESS/6. TiO2ă³èjjèj”æ^–ă»¼ TiO2 Balance Drawing/TiO2 Balance Diagram Layout1 (1).pdf 17929

sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/èċăÉè‰°ăŸ†è°Ĉè’šă††ăŸ†èı„æ–™/éjċ°éŸ”èı„æ–™ă††ăŸ†/2011ă¹5æœ^ă°•éœĈè|ă,žă³ċăĈĈé–”æ–ă...–ă,æ²ŸéĈšċš,ă†...ă°¹/ı¼^2011.6.10ı¼‰œ³ăĈĈæ”Ÿă”ăšă»•100K equipment quotes/Quotes on TiCl4 Pumps from Hazleton/Quotes on TiCl4 Pumps by Hazleton.pdf 18411

sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/èċăÉè‰°ăŸ†è°Ĉè’šă††ăŸ†èı„æ–™/éjċ°éŸ”èı„æ–™ă††ăŸ†/2011ă¹5æœ^ă°•éœĈè|ă,žă³ċăĈĈé–”æ–ă...–ă,æ²ŸéĈšċš,ă†...ă°¹/2011.6.9ċ»“ă^æ³ċæ–1æ,,èšăž°æ”ıċ‰°ăšĈæœ–é™,,ă»Ÿ/FL SmidthăšĈæœ–é™,,ă»Ÿ.doc 18465

sve034264 Encrypted.E01/Partition 1/Security [FAT32]/[root]/èċăÉè‰°ăŸ†è°Ĉè’šă††ăŸ†èı„æ–™/éjċ°éŸ”èı„æ–™ă††ăŸ†/2011ă¹5æœ^ă°•éœĈè|ă,žă³ċăĈĈé–”æ–ă...–ă,æ²ŸéĈšċš,ă†...ă°¹/2011.6.9ċ»“ă^æ³ċæ–1æ,,èšăž°æ”ıċ‰°ăšĈæœ–é™,,ă»Ÿ/ăž’æ,éé~ĈăšĈæœ–é™,,ă»Ÿ”1.doc 18469

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.9â††ââ
‡ç>™æ³câ-Œé—æ-â...-â,âž,â®¶æšÿâ»ææ-™/æž'æ,éé~€/Caldera/PanGang Tetrachloride Project___ Caldera Quotation_Technical 2011-04-28valvescom.pdf 18495

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.9â††ââ
‡ç>™æ³câ-Œé—æ-â...-â,âž,â®¶æšÿâ»ææ-™/TiCl4æ³µ/âšæ ¼æ-â€"â€"TiCl4æ³µæš€æœ-æ-¹æj^ -20110413-1.pdf 18502

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.8æ³câ-
Œé—æ-â-¹è-çä»â¹|çš,,âçæ"¹Inquiries in English - with__ markups - 6_03_2011/Inquiries in English - with markups/i¼^â²â-~i¼%Inquiry on Screw Pneumatic
Pump - with markups AC 06_03_2011.doc 18509

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.8æ³câ-
Œé—æ-â-¹è-çä»â¹|çš,,âçæ"¹Inquiries in English - with__ markups - 6_03_2011/Inquiries in English - with markups/i¼^â²æ²ÿé€šçš%Inquiry on Al Pellet
Weighing Volumetric Feeder - with markups AC 6_01_2011.doc 18510

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.8æ³câ-
Œé—æ-â-¹è-çä»â¹|çš,,âçæ"¹Inquiries in English - with__ markups - 6_03_2011/Inquiries in English - with markups/i¼^â²æ²ÿé€šçš%Inquiry on High
Temperature Slag Discharge Valve - with markups AC 6_01_2011.doc 18512

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/2011.6.8æ³câ-
Œé—æ-â-¹è-çä»â¹|çš,,âçæ"¹Inquiries in English - with__ markups - 6_03_2011/Inquiries in English - with markups/i¼^â²æ²ÿé€šçš%Inquiry on Refractory
Brick - with markups AC 6_01_2011.doc 18515

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/0612è¿àÊè%â
ââ#æš€æœ-é™,,â»¶(âçæ"¹i¼%/0612/FL Smidthæš€æœ-é™,,â»¶.doc 18567

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/éi'ç>®éí'èµ,,æ-™â††ââ#/2011â'5æœ^â°•éœ€èè|ä,žæ³câ-Œé—æ-â...-â,æ²ÿé€šçš,,â†...â®/0612è¿àÊè%â
ââ#æš€æœ-é™,,â»¶(âçæ"¹i¼%/0612/æž'æ,éé~€æš€æœ-é™,,â»¶"¹.doc 18572

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/è%...âš©èèµ,,æ-™/ä,%â°éžæ †è%ââ#é††è'-â,èèèèèµ,,æ-™/â²â-èèµ,,æ-™2011.6.20/æ°šâŒ-ç,%/â,èèèèè°æ-
‡/articleç>™çž'çè-æ°-âŒ-æ³•é'ç>™½æ°šâŒ-ââ°"â™"æ°"½"é"™æµæ·â¹.pdf 18798

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/è%...âš©èèµ,,æ-™/ä,%â°éžæ †è%ââ#é††è'-â,èèèèèµ,,æ-™/â²â-èèµ,,æ-™2011.6.20/æ°šâŒ-ç,%/â,èèèèè°æ-
‡/articleç>™çž'çè-é«~æ,çæ°"ç>æ³•â-æžšâ^¶ââ#ç³ç±³TiO_2.pdf 18802

sve034264 Encrypted.E01/Partition 1/Security
[FAT32]/[root]/è¿àÊè%ââ#è°cè'šâ††ââ#èèµ,,æ-™/è%...âš©èèµ,,æ-™/ä,%â°éžæ †è%ââ#é††è'-â,èèèèèµ,,æ-™/â²â-èèµ,,æ-™2011.6.20/æ°šâŒ-ââ°"â™"/æ°"éé'ç
æ°-âŒ-æ³•é'ç>™½æ°šâŒ-ââ°"â™"æ°"¹è¿àÊè%â-â¼-â¹æ-¥æ^æ°¹.pdf 18808

EXHIBIT D

From: Simona A. Agnolucci
Sent: Thursday, June 06, 2013 2:46 PM
To: 'Hemann, John (USACAN)'; Axelrod, Peter (USACAN)
Cc: Stuart L. Gasner; Katherine M. Lovett
Subject: RE: United States v. Liew--identification of case-in-chief documents

John,

Thanks. Let's plan to sit down together on the 17th. Let me know a couple of times that day that would work for us to come by your office.

Simona

From: Hemann, John (USACAN) [<mailto:John.Hemann@usdoj.gov>]
Sent: Thursday, June 06, 2013 1:28 AM
To: Simona A. Agnolucci; Axelrod, Peter (USACAN)
Cc: Stuart L. Gasner; Katherine M. Lovett
Subject: Re: United States v. Liew--identification of case-in-chief documents

Simona -

Thanks for your email. I think we should talk through these issues live.

I'm out from tomorrow through June 12 and tied up on the 13th and 14th. Pete is preparing for a trial that starts in a couple of weeks.

Could we schedule a time to talk about these issues on June 17?

John

From: Simona A. Agnolucci [<mailto:SAgnolucci@kvn.com>]
Sent: Wednesday, June 05, 2013 04:53 PM Eastern Standard Time
To: Hemann, John (USACAN); Axelrod, Peter (USACAN)
Cc: Stuart L. Gasner <SGasner@KVN.com>; Katherine M. Lovett <KLovett@kvn.com>
Subject: United States v. Liew--identification of case-in-chief documents

John and Pete,

Thanks for your letter regarding the identification of case-in-chief documents. While we appreciate your attempt to narrow the universe of 55 million documents to a more discrete subset, the letter and accompanying production do very little to move the ball forward.

The letter refers to nine different "attachments," many of which are lists of files that don't provide us with sufficient information to locate the underlying files themselves. By way of

example only:

- Many of the entries on Attachment A do not have corresponding SVE evidence numbers, so there is no way for us to know what documents you are identifying.
- Attachment C is a list of bank accounts that does not tell us which actual documents you are identifying.
- Attachment G (which itself identifies a quarter million documents) consists of lists of files that include some (but not all) file path names and several unfamiliar image names.
- The same is true of Attachment D. (Moreover, one of the list of files in that attachment is "evidence listing key 06202012.xlsx," which is a bulk listing of all 47 drive images you produced early last summer *in their entirety*.)

Because most of the electronic evidence you produced was in EnCase form, we have not necessarily processed the data. (As we have noted in court filings in this case, processing all of the data would be prohibitively expensive.) Accordingly, it would require significant manpower for us to search for the many individual documents identified among the 55 million you produced, and in the cases where we are missing critical identifying information, it is impossible for us to find the underlying documents.

We presume that you have all of these documents in native format and that you have isolated them in the process of identifying them. If we provided you with a hard drive, could you produce the collection onto a hard drive for us? Otherwise, we will have to spend *a lot* of time engaging in a back and forth about how to find the various individual documents on the lists you have provided, and it likely will take months before we have a complete set of "case-in-chief" documents to review.

Also, I don't believe we received the hard copies identified in item 5 of your letter. Can you please pdf those to me at your earliest convenience?

Thanks,
Simona

Simona A. Agnolucci

Attorney at Law

KEKER & VAN NEST LLP

415 676 2259 direct | [vCard](#) | sagnolucci@kvn.com
633 Battery Street, San Francisco, CA 94111-1809 | 415
391 5400 main | kvn.com