



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

June 15, 2018

**BY ECF AND HAND**

The Honorable Kimba M. Wood  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *Cohen v. United States*, 18 Mag. 3161 (KMW)**

Dear Judge Wood:

The Government respectfully submits this letter to update the Court as follows about the status of our production to Michael Cohen of materials seized pursuant to search warrant on April 9, 2018:

- *BlackBerries*: As previously noted, two BlackBerries were seized. On June 14, 2018, the Government produced to Cohen the contents of one of these BlackBerries; the Federal Bureau of Investigation (the “FBI”) is still in the process of attempting to extract data from the second BlackBerry. While the FBI cannot, therefore, estimate the volume of data on this latter device, the BlackBerry produced yesterday contains approximately 315 megabytes of data.
- *Reconstructed Shredded Documents*: As also previously noted, the contents of a shredding machine were seized on April 9, 2018. The reconstructed documents were produced today, and are approximately 16 pages long.
- *Contents of Encrypted Messaging Applications*: The Government was advised that the FBI’s original electronic extraction of data from telephones did not capture content related to encrypted messaging applications, such as WhatsApp and Signal. The FBI has now obtained this material. There are approximately 731 pages of messages, including call logs, which were also produced today.

The Government has conferred with counsel for Cohen and the parties jointly propose to the Court that—with the exception of the second BlackBerry, from which data has not yet been

cc: Alan Futerfas, Esq. (by ECF)  
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