

Exhibit 19

From: lkogan@koganlawgroup.com
To: [Brown, Laura J.S. \(ENRD\)](#)
Cc: [Buckley, Sarah \(ENRD\)](#); [Cox, Alexander K.](#); [Uholik, Brian \(ENRD\)](#); [Kolman, Chloe \(ENRD\)](#); [Devlin, Neal](#)
Subject: RE: Re: Brace - 30(b)(6) topics
Date: Wednesday, January 10, 2018 9:05:08 PM

Laura,

There should be no issue here.

The woman is 80 years old.

She need not be subject to deposition going beyond 5 pm.

If you want to depose her on Friday morning, fine.

But NO deposition tomorrow past 5pm.

Larry

----- Original Message -----

Subject: Re: Brace - 30(b)(6) topics

From: "Brown, Laura J.S. (ENRD)" <Laura.J.S.Brown@usdoj.gov>

Date: 1/10/18 8:57 pm

To: "lkogan@koganlawgroup.com" <lkogan@koganlawgroup.com>

Cc: "Buckley, Sarah (ENRD)" <Sarah.Buckley@usdoj.gov>, "Cox, Alexander K." <acox@kmglaw.com>, "Uholik, Brian (ENRD)" <Brian.Uholik@usdoj.gov>, "Kolman, Chloe (ENRD)" <Chloe.Kolman@usdoj.gov>, "Devlin, Neal" <ndevlin@kmglaw.com>

Larry,

We accepted Alex's proposal on Saturday that to avoid sequential depositions, you would offer the witnesses to testify beyond business hours. That was Defendants idea, not ours, and your statement that we are being "cruel and insensitive" by adopting defense counsel's proposal is inappropriate.

It is improper and disruptive for Defendants to continue to make demands regarding the schedule of our noticed witnesses, particularly as you repeatedly do so at the eleventh hour.

While we won't switch the order of the depositions, we will accommodate Mrs. Brace in the following way: We will start Ronald's deposition promptly at 9 am, take a half hour lunch and limit the length of the breaks. Under those circumstances, we will agree not to keep Mrs. Brace any later than 6:30.

Please ensure that you and Mr. Ronald Brace are at the office tomorrow morning to bring the deposition promptly at 9.

Laura

Sent from my iPhone

On Jan 10, 2018, at 8:12 PM, "lkogan@koganlawgroup.com" <lkogan@koganlawgroup.com> wrote:

Ladies and Gentlemen,

We have an immediate issue for your attention regarding tomorrow's depositions.

It concerns the order in which they need to proceed.

Given Mrs. Brace's elderly age (80 years old) and the stress she has experienced as the result of this week of depositions, she must be deposed tomorrow, Thursday, January 11, at 9:00 am BEFORE Ronald Brace.

Brian's statement last Saturday is both **cruel and insensitive** to the condition of an elderly woman when he states as follows:

"Beverly Brace - Thursday, January 11th, to begin immediately after the conclusion of Ronald Brace's deposition and to go until 8:00 p.m. and, if the United States deems necessary, to resume at 9 a.m. on Friday, January 12th"

Rather, Mrs. Brace can be and should be deposed tomorrow morning, after which you can continue with Ronald Brace as deposition witness for the remainder of the day, and if necessary, the following morning resuming at 9:00 am.

We advise you now so that you can alter your preparation schedule for tomorrow.

We look forward to receiving your consent, because it is both reasonable and the right thing to do.

Thank you.

Larry

----- Original Message -----

Subject: RE: Brace - 30(b)(6) topics

From: "Buckley, Sarah (ENRD)" <Sarah.Buckley@usdoj.gov>

Date: 1/10/18 7:00 pm

To: "Cox, Alexander K." <acox@kmgslaw.com>, "Brown, Laura J.S. (ENRD)" <Laura.J.S.Brown@usdoj.gov>, "Uholik, Brian (ENRD)" <Brian.Uholik@usdoj.gov>, "Kolman, Chloe (ENRD)" <Chloe.Kolman@usdoj.gov>

Cc: "lkogan@koganlawgroup.com" <lkogan@koganlawgroup.com>, "Devlin, Neal" <ndevlin@kmgslaw.com>