

Snider, David (USAFLS)

From: Hendrith V.A. Smith <hvasmith@gmail.com>
Sent: Tuesday, April 30, 2024 11:31 PM
To: Snider, David (USAFLS)
Cc: Johnny McCray; Zacca, Deric (USAFLS); Hendrith V.A. Smith
Subject: [EXTERNAL] Re: United States v. Carolyn Wade, 23-60173-CR | Proposed Protective Order

Dear David,

Receipt of your motion and proposed order are acknowledged with thanks.

Johnny directs me to inform you on behalf of Ms. Wade that we do not oppose the motion and agree to the terms of the proposed order.

We would be grateful to obtain copies of files numbered 1 through 21 with the exception of number 5, Ms. Wade's file, if it is your representation that you have reviewed this identical folder from Wompley and this is the source of all of the government's discovery from that source and that nothing contained in this folder has not already been provided to us.

Finally, we would be grateful to be provided a copy of the Subpoena which facilitated this 21 file dump.

Many thanks,

Hendrith

Hendrith V. A. Smith, JD, LEC

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On Tue, Apr 30, 2024 at 6:19 PM Snider, David (USAFLS) <David.Snider@usdoj.gov> wrote:

Johnny and Hendrith,

Further to my email below, attached is a proposed Motion for Protective Order and Protective Order.

Please advise us of your position.

Thanks,

David

David A. Snider

Assistant United States Attorney

Southern District of Florida

Office: 954-660-5696 | Cell: 954-695-0651

From: Snider, David (USAFLS)

Sent: Tuesday, April 30, 2024 3:04 PM

To: Johnny McCray <mccrayjlaw@gmail.com>; Hendrith V.A. Smith <hvasmith@gmail.com>

Cc: Zacca, Deric (USAFLS) <DZacca@usa.doj.gov>

Subject: United States v. Carolyn Wade, 23-60173-CR

Johnny and Hendrith,

Further to our telephone discussion after today's calendar call, below is a list of folder names that the government received from Womply. With the exception of the records in the Carolyn Wade folder, which was produced to the defense on March 18, 2024, I have not reviewed the records in these folders. With the understanding that the government is willing to make these records available as a courtesy to the defense upon entry of a protective order, please advise as to which folders you would like to receive.

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]
5. Carolyn Wade (provided to defense 3/18/24)
6. [REDACTED]
7. [REDACTED]
8. Haydee Granados
9. [REDACTED]
10. [REDACTED]
11. [REDACTED]
12. [REDACTED]
13. [REDACTED]
14. [REDACTED]
15. [REDACTED]

16. [REDACTED]
17. [REDACTED]
18. [REDACTED]
19. Tracy Wade
20. [REDACTED]
21. [REDACTED]

David A. Snider

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