

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

UNITED STATES OF AMERICA
ex rel. PAUL PIETSCHNER,

Plaintiff,

v.

KATHRYN PETRALIA;
ROBERT FROHWEIN; and
SPENCER ROBINSON,

Defendants.

Civil Action No.: 4:21-cv-110-SDJ

UNITED STATES OF AMERICA’S NOTICE OF INITIAL DISCLOSURES

Pursuant to the Court’s Order Governing Proceedings (ECF No. 69) and Federal Rule of Civil Procedure 26, Plaintiff the United States of America (the “United States”), hereby gives notice to the Court that on April 28, 2025, the United States served on all parties, through their counsel of record, the United States’ Initial Disclosures as provided by Federal Rule of Civil Procedure 26(a)(1)(A), which requires only a written statement. The Court’s Order Governing Proceedings (ECF No. 69), also orders the parties to produce “a copy of all documents, ESI, witness statements, and tangible things in the possession, custody, or control of the disclosing party that are relevant to the claim or defense of any party.” ECF No. 69, p. 4 (the “Initial Disclosure Document Production”). The United States’ Initial Disclosure Document Production contains protected information subject to the Bank Secrecy Act and other sensitive information subject to protections under a protective order.

On April 24, 2025, the parties filed a Joint Motion for Entry of a Protective Order, Federal Rule of Evidence 502(d) Order, and Order governing production of electronically stored information, which is pending before this Court. ECF No. 73.

On April 25, 2025, the United States filed an unopposed motion for extension of time to make its Initial Disclosure Document Production to await entry of a protective order given the nature of the claims at issue and the confidential information contained in the United States' document production. ECF No. 75.

The United States is prepared to make its initial disclosure document production within two days of entry of the Protective Order, ECF No. 73-1.

Dated: April 28, 2025

Respectfully submitted,

MICHAEL D. GRANSTON
Deputy Assistant Attorney General

ABE MCGLOTHIN, Jr.
Acting United States Attorney
Eastern District of Texas

/s/ Betty Young
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**ATTORNEYS FOR THE
UNITED STATES OF AMERICA**

CERTIFICATE OF SERVICE

I hereby certify that on April 28, 2025, I caused a true and correct copy of the foregoing document to be transmitted through the Court's electronic mailing service (CM/ECF) to all counsel of record who have consented to electronic service by the Court's electronic mailing service (CM/ECF).

/s/ Betty Young _____
BETTY S. YOUNG