

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

ADHAM AMIN HASSOUN,

Petitioner,

Case No. 1:19-cv-370-EAW

v.

JEFFREY SEARLS, in his official capacity
as Acting Assistant Field Office Director and
Administrator, Buffalo Federal Detention
Center,

Respondent.

NOTICE OF SUPPLEMENTAL DISCOVERY PRODUCTION

Respondent files this notice of supplemental discovery production consistent with Federal Rule of Civil Procedure 26(e)(1)(A). On June 12, 2020, Respondent certified that discovery production was complete. *See* Platt Decl. (Dkt. No. 251-1). On the basis of this certification, Respondent informed the Court that Respondent completed production of documents responsive to Petitioner's request for production number 2, to include the six categories of documents described in Petitioner's motion for sanctions and to compel. Hrg Tr. at 14:4–15:16 (Dkt. No. 218). Subsequent to this certification, Respondent notified the Court on June 27, 2020, that he had identified additional documents to be produced. Notice (Dkt. No. 251); *see also id.* at 2 (describing Respondent's notification to Petitioner about this corpus).

Respondent offers two updates. First, on July 17, 2020, Respondent produced a privilege log related to outstanding documents described in his June 27 notice—documents related to the government agencies' evaluation of Shane Ramsundar's credibility that occurred after Petitioner served his May 7, 2020 discovery demand letter. Ex. A, Platt Decl. ¶¶ 3-4. Respondent did not

send any documents to Petitioner from this Production Volume 018, but did produce a privilege log for every document. *Id.* ¶ 3.

Second, Respondent has identified an additional corpus of documents relevant to request for production number 2: documents arguably related to the credibility of Ahmed Abdelraouf. On July 16, 2020, counsel for Respondent informed counsel for Petitioner of the aforementioned. Platt Decl. ¶ 5. For these documents related to Mr. Abdelraouf—Production Volume 019—Respondent completed the supplemental production on July 17, 2020. *Id.* ¶¶ 5-6. Volume 019 also contains a single document related to the first category of documents identified by the Court in its June 18, 2020 order: “all additional documents that suggest Mr. Ramsundar or any other government witness has previously described similar allegations against other people.” *Id.* ¶ 7. That document is an email post-dating Petitioner’s May 7, 2020 discovery demand letter. *Id.*

Dated: July 24, 2020

Respectfully Submitted,

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