

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino
Date: Tuesday, November 30, 2021 8:23:00 PM

Hi Stanley,

Thank you for the conversation this afternoon. Per that discussion, it is our understanding that Mr. Scavino does not intend to appear for tomorrow's scheduled deposition. For your information, we will be proceeding on the record tomorrow to record his absence.

We will be in touch soon regarding next steps.

Best,

[REDACTED]
[REDACTED]

Select Committee to Investigate the January 6th Attack on the Capitol of the United States

From: [REDACTED]
Sent: Tuesday, November 30, 2021 1:43 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi Stanley,

I do think it would be helpful to discuss. I called earlier but got your voicemail. Please give me a call at [REDACTED].

From: [REDACTED]
Sent: Tuesday, November 30, 2021 1:42 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

[REDACTED] – as the Select Committee has yet to address the concerns we have raised, I believe our position remains fairly stated in our correspondence. I'm happy to discuss if that would be helpful.

Thanks,

Stanley

From: [REDACTED]
Sent: Tuesday, November 30, 2021 11:15 AM

To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Good morning, Stanley,

We are in receipt of your Friday correspondence, but I do not believe we received, as we requested by noon yesterday, confirmation of whether Mr. Scavino intends to appear tomorrow. Please respond to this email to confirm whether he will appear, or give me a call at [REDACTED].

From: [REDACTED]
Sent: Friday, November 26, 2021 4:40 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Folks – please see the attached correspondence.

From: [REDACTED]
Sent: Tuesday, November 23, 2021 5:53 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Thank you, Stanley. I appreciate the response. Attached, please find a letter reflecting, as I mentioned earlier, a final continuation of the document and deposition dates, as well as the subpoena for Mr. Scavino reflecting those dates.

Please let me know if you have any questions.

Have a happy Thanksgiving!

From: [REDACTED]
Sent: Tuesday, November 23, 2021 12:45 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi [REDACTED] – I have confirmed with Mr. Scavino that we can accept service of the subpoena on his behalf.

Thank you,

Stanley

From: [REDACTED]
Sent: Tuesday, November 23, 2021 9:21 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi Stan,

I can move some things around this morning if that's more convenient for you. Would 10 AM work?

From: [REDACTED]
Sent: Monday, November 22, 2021 10:56 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi [REDACTED] – happy to touch base, but am not “at work” tomorrow. I have my 2yo all day and my older boys in the afternoon. I also have a virtual court status hearing at 3pm. I expect that will last at least an hour. So long as you all don't mind the background noise, I'm happy to talk around my hearing at your convenience.

From: [REDACTED]
Sent: Monday, November 22, 2021 10:49 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi Stanley,

We'd like to check in tomorrow afternoon. Can you provide a few times when you are available?

Thank you.

From: [REDACTED]
Sent: Thursday, November 18, 2021 12:00 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Folks, please see the attached correspondence.

Thanks,

Stanley

From: [REDACTED]
Sent: Tuesday, November 16, 2021 1:09 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Thank you, Stanley. I am confirming receipt of your letter.

In advance of Friday's scheduled deposition, I am resending the House deposition rules and also attaching the resolution mentioned in those rules.

In light of Mr. Scavino's assertion of privilege over all the documents the Select Committee has requested, does Mr. Scavino intend to appear this Friday to provide substantive testimony – beyond assertions of privilege – about any of the subject matters the Select Committee has identified?

If Mr. Scavino intends to appear, please let us know who will be accompanying him for that deposition. We are taking the necessary logistical steps to prepare for his appearance and need a full list of attendees.

Thank you.

From: [REDACTED]
Sent: Monday, November 15, 2021 11:29 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Folks – please see the attached correspondence on behalf of Mr. Scavino.

Thanks,

Stanley

From: [REDACTED]
Sent: Wednesday, November 10, 2021 10:10 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi Stanley,

We are willing to grant one final extension for the deposition to next **Friday, November 19**. We will not be able to grant further continuances beyond that date. We request that we hear from you no later than **noon on Thursday, November 18**, on whether Mr. Scavino intends to testify about any of the identified matters, and if so, which ones.

We are also willing to grant a document production extension to **Monday, November 15**, to allow time for your conference with Mr. Scavino today and subsequent document production or the provision of a privilege log.

Thank you.

[REDACTED]

Select Committee to Investigate the January 6th Attack on the Capitol of the United States

From: [REDACTED]

Sent: Tuesday, November 9, 2021 10:32 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Dan Scavino

Hi [REDACTED] – thanks for sending this along. I think you will agree that this is a lot of ground to cover in just one day. Even if we were in a position to address what privileges or other objections warrant discussion – and we’re cognizant of Judge Chutkan’s 40 page opinion issued earlier this evening – I’m not sure I could prepare any witness for a deposition on the breadth of these subjects on such short notice. Next week, I have an in-person meeting with DOJ on Wednesday, but am prepared to travel to and from Palm Beach at least twice, on Tuesday and Thursday. I’m happy to keep the committee apprised of my progress in the interim and perhaps we might hone in on a subset of topics that can be prioritized. In the meantime, we would request a further extension of the deadline for Mr. Scavino to participate in a deposition.

I also acknowledge your request for a privilege log and will address this with Mr. Scavino promptly.

Please let me know if you would like to discuss.

Thanks,

Stanley

From: [REDACTED]

Sent: Tuesday, November 9, 2021 7:17 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Dan Scavino

Good evening, Stanley,

As promised, please find attached a letter identifying topics the Select Committee would like to explore with Mr. Scavino in a deposition. Our understanding is that you are meeting with him tomorrow and will be able to follow up with us tomorrow evening about the status of document review and Friday's deposition date. We are happy to schedule a time now for us to speak tomorrow evening, if you are amenable to that.

Thank you.

From: [REDACTED]
Sent: Sunday, November 7, 2021 10:28 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

That sounds good folks, speak to you soon.

Attached is the letter referenced in our correspondence.

From: [REDACTED]
Sent: Saturday, November 6, 2021 8:09 PM
To: Stanley Woodward [REDACTED]
Cc: [REDACTED]
Subject: Re: Dan Scavino

Hi Stanley,

[REDACTED] and I will plan to call you at 11 am tomorrow.

Please send along the attachment when you are able.

Thank you.

On Nov 6, 2021, at 10:29 AM, [REDACTED] wrote:

Thanks, Stanley. I can do any time tomorrow morning, but would like to connect earlier if you have time later today.

Sent from my iPhone

On Nov 6, 2021, at 9:36 AM, Stanley Woodward [REDACTED] wrote:

Hi [REDACTED] - sorry for the delayed response. Yes, I'm happy to connect

this weekend. I just ran out the door for a day of kids' soccer would you have time tomorrow morning?

And I can't seem to pull up the attachment on my phone but will send it as soon as I get home.

Thanks,

Stanley

Brand | Woodward

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On Nov 5, 2021, at 6:03 PM, [REDACTED]
[REDACTED] wrote:

Hi Stanley,

I gave you a call to follow up on a couple of items but got your voicemail. Can we schedule a time to talk this evening or tomorrow?

Thanks.

From: [REDACTED]
Sent: Friday, November 5, 2021 4:53 PM
To: [REDACTED]; [REDACTED]
[REDACTED]
Subject: RE: Dan Scavino

Hi Stanley,

The letter refers to an attachment that I don't think was appended to the last email. Can you pass that along?

Thank you.

[REDACTED]
[REDACTED]
Select Committee to Investigate the January 6th Attack
on the Capitol of the United States

From: [REDACTED]
[REDACTED]

Sent: Friday, November 5, 2021 4:49 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Dan Scavino

[REDACTED] – as discussed, please see the attached correspondence.

Thanks,

Stanley

From: [REDACTED]

Sent: Wednesday, November 3, 2021 2:00 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Dan Scavino

Stanley,

Good talking with you this afternoon. As discussed, we will continue the deadline for your client to produce documents responsive to the subpoena by one day – now **Friday, 11/5**. I understand that you are imaging your client's machines, reviewing whether he has any responsive documents, and evaluating possible privilege claims. I further understand you are preparing a letter to the Select Committee about this process and can deliver that to us in the next day or so. We will review that letter and be prepared to further engage about documents and the upcoming deposition on Friday.

Talk to you soon,

[REDACTED]

Cc: [REDACTED]

From: [REDACTED]
[REDACTED]

Sent: Tuesday, November 2, 2021 8:47 PM

To: [REDACTED]

Cc: [REDACTED]
Subject: RE: Dan Scavino

Folks – I wanted to follow up and provide a brief update. I'm sorry for not reaching out sooner, but logistics continued to prove challenging. I'm in the middle of a trial in Fairfax, Virginia, but was able to fly down to Palm Beach today to meet with Mr. Scavino because the Court was closed (election day). I'm on my way back to DC now and could connect over teams today, but probably not until after 9. Tomorrow I'm back in trial, so again would probably not be able to do a teams meeting until after 7. I'm also happy to schedule a call tomorrow, but I unfortunately am not given much notice as to when we'll have a break and they're only 15 minutes long.

Alternatively, the trial concludes Thursday at 2:30pm and I could be available for a teams after 3:30pm or any time on Friday.

Thanks,

Stanley

From: [REDACTED]
Sent: Wednesday, October 27, 2021 5:11 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi Stanley,

Thanks for your message. We are willing to provide another brief extension to accommodate the schedule you suggest below, though no further delay absent something unforeseen. I want to give you the time you need to search for documents and prepare your client for his deposition, though this has been pending for some time. Let's schedule a call for Tuesday after your meeting with him to confirm timing. Can you suggest some windows when you're available? [REDACTED] and I will send a Teams invite for a time that works for all.

To confirm, we will delay the document production deadline until Thursday, November 4 and schedule the deposition for

Friday, November 12 (Thursday 11/11 is Veteran's Day).

Thanks,

[REDACTED]

From: [REDACTED]
[REDACTED]
Sent: Wednesday, October 27, 2021 4:39 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Hi folks – I wanted to touch base in advance of tomorrow's deadline to request another brief extension. As I think I mentioned, I'm preparing for a trial that starts Monday and Mr. Scavino and I have had trouble finding time to meet in person. At the moment, I'm scheduled to meet with him on Tuesday, November 2, 2021 (because the Court is closed for Election Day). At that time, I'll be making a forensic backup of his electronic devices and will perform an initial search for records responsive to his subpoena. Assuming that it appears there are no responsive records, I will confirm the same with you, subject to a more formal search by me after the forensic backups are completed. If this is amenable to you all, I would propose just another one week extension on both deadlines and we can plan to speak on Tuesday or at your convenience.

Thank you,

Stanley

From: [REDACTED]
Sent: Wednesday, October 20, 2021 3:35 PM
To: Stanley Woodward [REDACTED]
Cc: [REDACTED]
Subject: RE: Dan Scavino

Stanley,

Good talking with you today. This confirms our agreement to postpone the dates on Mr. Scavino's subpoena by one week. That moves the deadline for production of documents to 10/28 and the deposition date to 11/4.

I understand that you are in the process of ascertaining whether Mr. Scavino has any documents responsive to the subpoena, including imaging his phone and computer. Please let us know asap if there are such documents and whether they can be promptly produced. As discussed, we are willing to talk with you about the subject matters that we will seek to develop with Mr. Scavino during his deposition, so you can evaluate privilege issues. We do not believe any valid privilege claim exists, though are willing to talk with you about the scope of our inquiry in the interest of getting the deposition done.

Please let [REDACTED] and I know when you have more information. Thanks again for reaching out – looking forward to working with you on this moving forward.

[REDACTED]

Cc: [REDACTED]

From: Stanley Woodward

[REDACTED]

Sent: Wednesday, October 20, 2021 1:58 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Dan Scavino

Hi [REDACTED] - 3 is great. You can call my cell, below.

Thanks,

Stanley

Brand | Woodward

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

On Oct 20, 2021, at 1:01 PM, [REDACTED]

[REDACTED] wrote:

Hi Stanley -

Thanks for your message. Can we talk at 3? It will be [REDACTED] and I. What is best number for you then?

Thanks,

[REDACTED]

Sent from my iPhone

On Oct 20, 2021, at 12:30 PM,

[REDACTED]

wrote:

[REDACTED] – we've been retained to represent Dan Scavino in responding to the Select Committee's subpoena to Dan for records and testimony. Is there a convenient time for us to have an introductory call?

Thanks,

Stanley

Brand | Woodward

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]