

From: Noble, Daniel
To: Williams, Karen D.
Cc: Goldman, Daniel; Bitar, Maher; Bair, James; Kenny, Peter; Mitchell, Nicolas
Subject: RE: Counsel for P. Wells Griffith
Date: Monday, November 4, 2019 7:43:00 PM
Attachments: image002.png
image003.png
20191104 - Committees Subpoena Cover Letter - Wells Griffith.pdf
20191104 Subpoena to Griffith.pdf
House Deposition Regulations.pdf
House Resolution 6 Sec 103(a).pdf
HPSCI Rules of Procedure.pdf

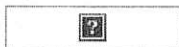
Karen,

Please see the attached letter, subpoena, House deposition regulations, and HPSCI's rules of procedure.

Best,
Dan

From: Williams, Karen D. [REDACTED]
Sent: Monday, November 4, 2019 3:16 PM
To: Noble, Daniel [REDACTED]
Cc: Goldman, Daniel [REDACTED]; Bitar, Maher [REDACTED]; Bair, James [REDACTED]; Kenny, Peter [REDACTED]; Williams, Karen D. [REDACTED]
Subject: RE: Counsel for P. Wells Griffith

Dan –
Please see the attached.



Karen Williams
Member | Cozen O'Connor
1200 19th Street, NW | Washington, DC 20036
P: 202-304-[REDACTED] F: 202-540-[REDACTED]
Email | [Map](#) | [cozen.com](#)

From: Noble, Daniel [REDACTED]
Sent: Monday, November 4, 2019 12:14 PM
To: Williams, Karen D. [REDACTED]
Cc: Goldman, Daniel [REDACTED]; Bitar, Maher [REDACTED]; Bair, James [REDACTED]; Kenny, Peter [REDACTED]
Subject: RE: Counsel for P. Wells Griffith

****EXTERNAL SENDER****

Ok thanks Karen. Do you think you can get us a letter by 1 or 2pm today?

From: Williams, Karen D. [REDACTED]
Sent: Monday, November 4, 2019 12:01 PM
To: Noble, Daniel [REDACTED]
Cc: Goldman, Daniel [REDACTED]; Bitar, Maher [REDACTED]; Bair, James [REDACTED]; Kenny, Peter [REDACTED]; Williams, Karen D. [REDACTED]
[REDACTED]

Subject: RE: Counsel for P. Wells Griffith

Dan,

I will accept service on behalf of Mr. Griffith. I will address your other requests separately.

Regards,

Karen



Karen Williams

Member | Cozen O'Connor

1200 19th Street, NW | Washington, DC 20036

P: 202-304-██████ F: 202-540-██████

[Email](#) | [Map](#) | [cozen.com](#)

From: Noble, Daniel ██████████
Sent: Monday, November 4, 2019 10:01 AM
To: Williams, Karen D. ██████████
Cc: Goldman, Daniel ██████████; Bitar, Maher ██████████; Bair, James ██████████; Kenny, Peter ██████████
Subject: RE: Counsel for P. Wells Griffith

****EXTERNAL SENDER****

Karen,

As we discussed last night, we'd appreciate it if you could send us a letter setting forth the reasons why Mr. Griffith intends to defy a congressional subpoena for a deposition tomorrow, including the verbal direction you or he received from the White House counsel's office and their basis for that instruction. Please also note in writing your willingness to accept service of a subpoena on Mr. Griffith's behalf. If we could get the letter by 1 pm today, it would be much appreciated. And if the White House provides any instruction in writing, could you please provide a copy of that as well?

Thank you.

Dan

From: Williams, Karen D. ██████████
Sent: Sunday, November 3, 2019 8:48 AM
To: Noble, Daniel ██████████
Cc: Goldman, Daniel ██████████; Bitar, Maher ██████████; Bair, James ██████████; Kenny, Peter ██████████; Williams, Karen D. ██████████
Subject: Re: Counsel for P. Wells Griffith

Dan -

Let's plan to speak at 6 pm. Thank you

On Nov 2, 2019, at 9:01 PM, Noble, Daniel ██████████ wrote:

****EXTERNAL SENDER****

Ok thanks. Can we set a time to speak tomorrow afternoon? I'm open between 1 and 7. Thanks.

On Nov 2, 2019, at 8:45 PM, Williams, Karen D. [REDACTED] wrote:

Dan –

Mr. Griffith is continuing to consider his position regarding appearing pursuant to a subpoena. I will spoke with him tomorrow and then follow up with you.

Regards,
Karen

<image003.png>

Karen Williams
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1200 19th Street, NW | Washington, DC 20036
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From: Noble, Daniel [REDACTED]
Sent: Saturday, November 2, 2019 12:36 PM
To: Williams, Karen D. [REDACTED]
Cc: Goldman, Daniel [REDACTED]; Bitar, Maher [REDACTED]; Bair, James [REDACTED]; Kenny, Peter [REDACTED]
Subject: Re: Counsel for P. Wells Griffith

****EXTERNAL SENDER****

Ok please provide an update as to where things stand this evening. We need to figure this out by tomorrow as we are juggling multiple depositions this week. If your client intends to defy a duly authorized congressional subpoena, we need to know that sooner rather than later. Thanks.

On Nov 2, 2019, at 12:33 PM, Williams, Karen D. [REDACTED] wrote:

Dan,

I had understood from our conversation yesterday that we could have the weekend to get back to you on Mr. Griffith appearing under a subpoena. I have a commitment this afternoon (and it is not the Nats parade) so a definitive answer by 5 pm today is not feasible. Let me confer with Mr. Griffith and I will provide a status this evening.

Regards,
Karen

<image004.png>

Karen Williams
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From: Noble, Daniel [REDACTED]
Sent: Saturday, November 2, 2019 12:22 PM
To: Williams, Karen D. [REDACTED]
Cc: Goldman, Daniel [REDACTED]; Bitar, Maher
[REDACTED]; Bair, James
[REDACTED]; Kenny, Peter
[REDACTED]
Subject: Re: Counsel for P. Wells Griffith

****EXTERNAL SENDER****

Karen,

I understand Mr. Griffith is unwilling to appear voluntarily for a deposition as the Committees requested. I wanted to check in to see if you have determined whether Mr. Griffith would appear for a deposition pursuant to subpoena?

As it stands, Mr. Griffith's deposition is noticed for Tuesday at 9:00 AM and we are prepared to issue a subpoena to compel his appearance at that time. Can you confirm that Mr. Griffith will appear under subpoena, notwithstanding any efforts by the White House to block him? Mr. Griffith's failure to appear, of course, could be used as evidence against him in a contempt proceeding. I know you asked if we might have some flexibility in scheduling, but I don't think it makes sense to discuss that until we answer the threshold question of whether Mr. Griffith will comply with a subpoena.

Could you please let us know by 5:00 pm today? Happy to hop on the phone to discuss, too.

Thanks,
Dan

On Oct 31, 2019, at 5:42 PM, Williams, Karen D. [REDACTED] wrote:

Dan,
Yes, tomorrow at 10 a.m. works. Please let me know if I should expect a call from you or call your desk number.

Regards,
Karen

<image001.png>

Karen Williams
Member | Cozen O'Connor
1200 19th Street, NW | Washington, DC 20036
P: 202-304- [REDACTED] F: 202-540- [REDACTED]

From: Noble, Daniel [REDACTED]
Sent: Thursday, October 31, 2019 5:26 PM
To: Williams, Karen D. [REDACTED]
Cc: Goldman, Daniel [REDACTED];
Bitar, Maher [REDACTED]; Bair, James
[REDACTED]; Kenny, Peter
[REDACTED]
Subject: RE: Counsel for P. Wells Griffith

****EXTERNAL SENDER****

Karen,

Thanks very much for being in touch. Could we do a call tomorrow morning at 10:00 am to discuss the deposition request?

Best,
Dan

Daniel S. Noble
Senior Investigative Counsel (Majority)
House Permanent Select Committee on Intelligence
The Capitol (HVC-304)
Desk: 202-226-[REDACTED]
Cell: 202-596-[REDACTED]
Secure: 936-[REDACTED]

From: Williams, Karen D. [REDACTED]
Sent: Thursday, October 31, 2019 4:31 PM
To: Noble, Daniel [REDACTED];
Goldman, Daniel [REDACTED]; Bitar,
Maher [REDACTED]; Bair, James
[REDACTED]; Kenny, Peter
[REDACTED]
Cc: Williams, Karen D. [REDACTED]
Subject: Counsel for P. Wells Griffith

Mr. Noble,
I am writing to notify you that I am representing Preston Wells Griffith regarding the House of Representatives' impeachment inquiry. Please let me know if you would like to speak later today or tomorrow about the deposition request. My contact information is below.

Regards,
Karen

<image003.png>

Karen Williams
Member | Cozen O'Connor
1200 19th Street, NW | Washington, DC 20036
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Email | [Map](#) | [cozen.com](#)

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