

Exhibit 1

Michael Hiller

From: Michael Hiller
Sent: Monday, September 11, 2017 3:17 PM
To: 'Dolinger, Samuel (USANYS)'
Cc: Lauren Rudick
Subject: RE: Washington v. Sessions, 17 Civ. 5625

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Dear Sam,

The Court made very clear at the hearing that, if the parties required additional time within which to submit the joint discovery letter that was directed, the deadline would be extended. (The Court did not invite unilateral submissions from the parties.) There is, therefore, no need for you to send any letter today other than one acquiescing to our requested two-day extension. Any suggestion by defendants to the contrary would suggest that you are endeavoring to manufacture an urgency that does not exist. We would have no choice but to respond to any such letter by your office, by informing the Court that you insisted upon filing your own letter seeking affirmative relief on a day when you knew I would be unable to respond due to a medical emergency affecting a close family member.

To be perfectly clear – the Court directed a jointly-submitted letter, not unilateral submissions. And he offered to extend the date by which such joint letter would be submitted if it is necessary. Sam, it is necessary. And frankly, I am amazed that we are even having this extended back and forth.

Michael S. Hiller

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