

DOCUMENT REQUESTS

Please produce the documents set forth in Schedule A, provided, however, that in order to facilitate production of documents on an expedited basis, you may limit your production at this time to documents you furnished at any time after November 8, 2016 to: (a) the Special Counsel's Office established by Department of Justice Order No. 3915-2017 (May 17, 2017); (b) the United States Attorney's Office for the Southern District of New York ("SDNY"); (c) any other federal or state regulatory and/or law enforcement agency; (d) any congressional committee; or (e) in civil or other litigation. This includes but is not limited to documents that were voluntarily provided, produced under compulsion, or seized. Instructions for producing documents appear in Schedule B, and definitions appear in Schedule C.

SCHEDULE A

- 1) All documents relating to the following:
 - a) Communications between Donald McGahn and President Donald Trump on or about January 26-27, 2017, relating to Michael Flynn's statements to the FBI about his contacts with Sergey Kislyak.
 - b) The resignation or termination of Michael Flynn, including but not limited to the discussion of Sean Spicer's February 14, 2017 public statements about Flynn's resignation.
 - c) President Trump's contacts with James Comey on or about January 27, 2017, February 14, 2017, March 30, 2017, and April 11, 2017.
 - d) Communications involving one or more of the following individuals on or about May 8-9, 2017 relating to the possible termination of James Comey: President Trump, Vice President Pence, Reince Priebus, Stephen Bannon, Don McGahn, Jared Kushner, Stephen Miller, Jeff Sessions, and/or Rod Rosenstein. Such communications include, but are not limited to, all draft termination letters and related documents and all documents relating to the May 9, 2017 Rosenstein memorandum to Sessions entitled "Restoring Public Confidence in the FBI."
 - e) The May 9, 2017 termination of James Comey, including but not limited to the reasons for the termination.
 - f) The actual or possible resignation or termination of:
 - i) Jeff Sessions, including but not limited to any discussion involving President Trump regarding Sessions's possible resignation or firing on or about May 17, 2017, July 2017, and November 2018;
 - ii) Rod Rosenstein, including but not limited to any discussion involving President Trump regarding Rosenstein's possible resignation or firing throughout 2017;

- iii) Robert Mueller, including but not limited to any discussion involving President Trump regarding Mueller's firing on or around June 2017, or any conversation in which President Trump stated, in words or substance, that he wanted the Mueller investigation shut down, restrained, or otherwise limited in or around December 2017.

- g) The June 9, 2016 Trump Tower meeting attended by Donald Trump Jr., Paul Manafort, Kushner, Natalia Veselnitskaya, Rob Goldstone, and Rinat Akhmetshin (the "Trump Tower meeting"), including but not limited to all documents relating to the July 8, 2017 statement released in the name of Donald Trump Jr.

- h) Discussions or efforts to discipline, reassign, terminate, encourage or force to resign, demote, or otherwise affect the job status of any of the following: Andrew McCabe, Jim Rybicki, Bill Priestap, Jim Baker, Peter Strzok, Lisa Page, and/or Bruce Ohr.