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THE LAW FIRM OF PUCKETT AND FARAJ, PC

October 4, 2011

<u>Via</u>

Ms. Cynthia Oberg Assistant United States Attorney 211 W. Fort Street Detroit, MI 48226

Re: Discovery; U.S. v. Hassan Aoun

Dear Ms. Oberg:

On Nov 8 I received 27 CDs and a cassette tape constituting the discovery in the case of U.S. v. Aoun. Of the 27 CDs, 26 have files with unassociated applications. I am able to open files using MS Word, Adobe Reader and Word Perfect. None of these programs recognized the files on the CDs. Also, the video recording on item 2 is unintelligible.

I request that you please provide guidance on how to access the files on the discovery CDs. Alternatively, please provide CDs containing files that are readable using one of the common word processing or "reader" programs.

I have included a list of the discovery items that posed a problem and a comment about what the problem is. The word "Item" below refers to your use of the word "Item" in your "Defense Counsel's Acknowledgement of Receipt of Discovery" notice. Below is a list of the discovery items and the problems associated with each.

- 1. Item 2, (1D2) video 1 unintelligible.
- 2. Item 3, a CD (1D3), contains files with unassociated applications. The files will not open.
- 3. Item 4, a CD labeled DE 14488. On the letter from the AUSA the CD is referred to as "DE-1448." This CD contains files with unassociated and unknown applications. The files will not open.
- 4. Item 5, CD (1D5), labeled 14488, referred to on the AUSA letter as 1448. This CD contains files with unassociated and unknown applications. The files will not open.
- 5. Item 6, CD (1D6), labeled DE 14488, Mohamad Aoun and Tarrik Bazzi. This CD contains files with unassociated and unknown applications. The AUSA letter refers to the CD as "1448" and states Mohamad Bazzi and Tarrik Bazzi. The files will not open.
- 6. Item 7, a CD (ID7), contains files with unassociated applications. Files will not open.
- 7. Item 8, a CD (ID8), contains files with unassociated applications. Files will not open.

- 8. Item 10, a CD (ID9), contains files with unassociated applications. The CD labeled DE-14488, Mohamad Aoun & Tarrik Bazzi. The AUSA letter states Mohamad Bazzi and Tarrik Bazzi.
- 9. Item 11, a CD (ID11), contains files with unassociated applications.
- 10. Item 14, a CD (ID14), contains files with unassociated applications.
- 11. Item 16, a CD (ID16), contains files with unassociated applications.
- 12. Item 17, a CD (ID17), contains files with unassociated applications.
- 13. Item 18, a CD (ID18), contains files with unassociated applications.
- 14. Item 20, a CD (ID20), contains files with unassociated applications.
- 15. Item 22, a CD (ID22), contains files with unassociated applications.
- 16. Item 23, a CD (ID23), labeled S-00006700, Mohamad Aoun & Hassan Aoun. The AUSA letter refers to the CD as "S-0000670". This CD contains files with unassociated applications.
- 17. Item 26, a CD (ID26) contains files with unassociated applications.
- 18. Item 29, a CD (ID29) contains files with unassociated applications.
- 19. Item 30, a CD (ID30) contains files with unassociated applications.

I may be reached by email at haytham@puckettfaraj.com or by telephone at 760-521-7934.

Sincerely.

Hagtham Far