



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 12, 2018

By Email

Oath Holdings, Inc.
Attn: Legal Department
Lawenforcement-request-delivery@oath.com

To whom it may concern:

You are hereby directed to preserve, under the provisions of 18 U.S.C. § 2703(f)(1), any and all content and other information associated with the accounts listed below, including but not limited to: any emails presently stored in the accounts (including any emails in Draft or Trash folders), any Google Docs or Google Drive content associated with the accounts, and any backup copies of the accounts currently in your possession, custody, or control:

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You are directed to preserve the records described above for a period of 90 days. This letter applies only retrospectively; it does not obligate you to capture and preserve new information that arises after the date of this letter. In view of the ongoing nature of the underlying investigation, you are requested not to disclose the existence of this letter to the subscriber(s) associated with the account(s) or any other person, other than as necessary to comply with this letter. If you intend to make any such disclosure, please notify me beforehand so that I may obtain a non-disclosure order if necessary. If your company is technically unable to preserve the above information without notifying the subscriber or altering the subscriber's account in any manner that might cause the subscriber to conclude that information in the account is being preserved or viewed, please notify me before taking such action. Thank you for your cooperation.

Sincerely,

GEOFFREY S. BERMAN
United States Attorney

By:

[REDACTED]
Assistant United States Attorney
Telephone: [REDACTED]