

Exhibit K:

**June 18, 2014 Email from True the Vote's
Counsel Requesting Meet and Confer**

From: MLockerby@foley.com
To: "Hartt, Grover (TAX)"; "bbenitez@steptoe.com"; "jlamken@mololamken.com"
Cc: [Sergi, Joseph A. \(TAX\)](mailto:Sergi.Joseph.A.(TAX)@steptoe.com); "egerson@steptoe.com"; jshur@mololamken.com; CMitchell@foley.com; WDavis@foley.com; MGutierrez@foley.com; "jeastman@chapman.edu"; [Noel Johnson](#); [Kaylan Phillips](#)
Subject: True the Vote, Inc. v. Internal Revenue Service et al, 1:13-cv-00734 (D.D.C.) – Spoliation of Evidence
Date: Wednesday, June 18, 2014 10:31:00 PM
Attachments: [Correspondence re True the Vote v. IRS 113-cv-734.msg](#)
[RE TTV v. IRS et al 113-cv-00734 \(D.D.C.\) Litigation Hold Preservation of Responsive Evidence.msg](#)
[RE TTV v. IRS et al 113-cv-00734 \(D.D.C.\) Litigation Hold Preservation of Responsive Evidence.msg](#)
[C Mitchell Letter re TTV 6-16-14.pdf](#)
Importance: High

Dear Counsel:

From your correspondence, it is not possible to ascertain whether each of your respective clients will consent to the relief sought by our client, True the Vote, Inc. ("TTV"), as set forth in Ms. Mitchell's correspondence of June 16, 2014. A copy of this correspondence is attached for your convenience.

Specifically, your correspondence does address whether your respective client(s) will consent to have a computer forensics expert access its, his, or her computer(s)—both "official" and "personal"—for the purpose of (1) cloning the hard drive(s), (2) attempting to restore any files that may have been lost or destroyed, inadvertently or deliberately; and (3) seeking to restore any electronically stored information pertinent to this litigation that may have been lost or destroyed.

Accordingly, please let me know your availability on Friday, June 20, 2014 to "meet and confer" regarding the relief that TTV seeks.

Thank you for your consideration.

Michael J. Lockerby

Foley & Lardner LLP
3000 K Street, N.W. | Suite 600
Washington, DC 20007-5109
P 202.945.6079

[View My Bio](#)
[Visit Foley.com](#)



The preceding email message may be confidential or protected by the attorney-client

privilege. It is not intended for transmission to, or receipt by, any unauthorized persons. If you have received this message in error, please (i) do not read it, (ii) reply to the sender that you received the message in error, and (iii) erase or destroy the message. Legal advice contained in the preceding message is solely for the benefit of the Foley & Lardner LLP client(s) represented by the Firm in the particular matter that is the subject of this message, and may not be relied upon by any other party.