EXHIBIT 4

Thursday, June 19, 2025 at 9:28:22 PM Eastern Daylight Time

Subject:	RE: Documents missing from Defendants' discovery
Date:	Wednesday, June 18, 2025 at 7:40:29 PM Eastern Daylight Time
From:	Murphy, Lindsay M. (CIV)
To:	Noam Biale, Alexander A Abdo, Alexandra Conlon, Courtney Gans, Jackson Busch, Jameel Jaffer, Michael Tremonte, Ramya Krishnan, Scott Wilkens, Talya R Nevins, Xiangnong Wang
CC:	Busen, Jesse (CIV), Hennes, Stefanie (CIV), Kanellis, William G. (CIV), Kanter, Ethan (CIV), Moss, Benjamin M. (CIV), Santora, Victoria M (CIV), Stone, Paul (CIV), Strokus, Jessica D. (CIV), Yen, Shawna (USAMA)
Attachments:	image001.jpg, image002.jpg, image003.jpg, image004.jpg, image005.jpg, image006.jpg, image007.jpg, image008.jpg

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This message came from outside your organization.

Hi Noam,

We are still running down most of the documents on your list. Some documents, the agencies don't have/don't exist. Others, they're trying to track down. And yet others are being reviewed for responsiveness/privilege. So, we haven't made any decisions not to produce them yet. Two exceptions: Documents 1.c, 1.d, and 1.e, on your list were submitted to the judge in camera and ex parte on June 11; and Document 2.a.i was included in Production Volume 01, shared with you last Friday (DEF-088-DEF-094).

Lindsay

From: Noam Biale <NBiale@shertremonte.com>
Sent: Wednesday, June 18, 2025 6:22 PM
To: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>; Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; Jackson Busch <jackson.busch@knightcolumbia.org>; jameel.jaffer <jameel.jaffer@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>
Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>
Subject: [EXTERNAL] RE: Documents missing from Defendants' discovery

Hi Lindsay,

Following up on the list of documents I sent Sunday night, we haven't heard back from you on them

on way or the other, so we assume you are not producing them. We will file a motion to compel tomorrow.

Please also add to the list of documents we are requesting the cable that is discussed in this article:

https://www.politico.com/news/2025/06/18/social-media-screening-student-visas-00413160

Thanks,
Noam

SHER TREMONTE

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From: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>
Sent: Monday, June 16, 2025 12:55 PM
To: Alexander A Abdo <alex.abdo@knightcolumbia.org>; Alexandra Conlon <Aconlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; Jackson Busch <jackson.busch@knightcolumbia.org>; jameel.jaffer <jameel.jaffer@knightcolumbia.org>; Michael Tremonte <MTremonte@shertremonte.com>; Noam Biale <NBiale@shertremonte.com>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Xiangnong Wang <george.wang@knightcolumbia.org>
Cc: Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>; Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Moss, Benjamin M. (CIV) <Benjamin.M.Moss2@usdoj.gov>; Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>
Subject: RE: Documents missing from Defendants' discovery

Noam – acknowledging receipt of your letter and letting you know that we're working through the list of documents you sent this morning to determine what we can produce and by when. We're also working to send you ROG responses later today.

Lindsay

From: Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>
Sent: Monday, June 16, 2025 9:26 AM
To: Murphy, Lindsay M. (CIV) <Lindsay.M.Murphy@usdoj.gov>
Subject: FW: Documents missing from Defendants' discovery

From: Noam Biale <NBiale@shertremonte.com>
Sent: Sunday, June 15, 2025 11:53 PM
To: Kanellis, William G. (CIV) <William.G.Kanellis@usdoj.gov>
Cc: jameel.jaffer <jameel.jaffer@knightcolumbia.org>; Ramya Krishnan <ramya.krishnan@knightcolumbia.org>; carrie.decell@knightcolumbia.org; Xiangnong Wang <george.wang@knightcolumbia.org>; Talya R Nevins <talya.nevins@knightcolumbia.org>; Jackson Busch <jackson.busch@knightcolumbia.org>; Scott Wilkens <scott.wilkens@knightcolumbia.org>; arulanantham@law.ucla.edu; Michael Tremonte <MTremonte@shertremonte.com>; Alexandra Conlon <Aconlon@shertremonte.com>; Courtney Gans <CGans@shertremonte.com>; Kanter, Ethan (CIV) <Ethan.Kanter@usdoj.gov>; Santora, Victoria M (CIV) <Victoria.M.Santora@usdoj.gov>; Strokus, Jessica D. (CIV) <Jessica.D.Strokus@usdoj.gov>; Busen, Jesse (CIV) <Jesse.Busen@usdoj.gov>; Stone, Paul (CIV) <Paul.F.Stone@usdoj.gov>; Yen, Shawna (USAMA) <Shawna.Yen@usdoj.gov>; Hennes, Stefanie (CIV) <Stefanie.Hennes@usdoj.gov>
Subject: [EXTERNAL] Documents missing from Defendants' discovery

Dear All,

Based on our review of the discovery you provided and the deposition testimony of Messrs. Armstrong and Watson, it has become clear to us that there are numerous gaps in Defendants' productions. The attached letter identifies the documents that are missing and should be turned over immediately. Because the 30 day deadline for you to respond to our RFPs and interrogatories has already lapsed, we ask that you respond to the attached letter by **close of business tomorrow** or we will have to file a motion to compel.

Regards,
Noam

SHER TREMONTE

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