

**Cheryl Johnson**

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**Subject:** FW: United States v. Kenneth Bryan Ritchey, 1:21-CR6-HSO-RPM

**From:** "Starnes, Bennett (CRM)" <[Bennett.Starnes@usdoj.gov](mailto:Bennett.Starnes@usdoj.gov)>

**Date:** March 16, 2022 at 2:36:33 PM CDT

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Counsel,

As promised in my letter from December 17, 2021 and your response of January, 14, 2022 (both attached), I write with two updates.

The first is to notify you that the filter team is nearing completion of our review, however we are withholding the release pending the decision of the court.

The second is to give you a further explanation of our process. We have used attorney-specific search terms and generic terms to identify material potentially subject to a claim of attorney client privilege, attorney work product, or other protection ("Potentially Protected Material or "PPM"). The Filter Team will continue to withhold the PPM from the prosecution team and will provide it to you for review and assertion.

The attorney terms were supplemented by the Filter Team's review, but were based initially on attorney names, email addresses, and contact information provided by your co-counsel, Mr. Nichols, to AUSA Van Buskirk by email on April 27, 2020.

I am attaching a list of the attorney-specific and generic terms for your review. If you believe there are additional attorney names or information which would assist in reviewing the material, please provide those at your earliest convenience.

Thank You,

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**EXHIBIT H**

## Generic Terms

attorney client  
attorney client privilege  
attorney w/2 client  
attorney w/3 privilege\*  
attorney w/3 work w/2 product  
attorney work product  
attorney\*  
counsel\*  
esq\*  
law firm  
law w/2 firm  
law\*  
lawyer\*  
legal advice  
legal assistant\*  
legal representat\*  
legal representative\*  
legal secretary  
legally privileged  
privileg\*  
privilege\*  
privileged and confidential  
privileged w/2 confidential  
privileged w/2 confidential  
communication  
trial lawyer\*  
work product\*  
atty\*  
legal  
barrister\*  
solicitor\*  
advocate\*  
law group  
lawgroup  
general counsel  
attorney  
"law firm"  
"attorney client"  
"law group"  
attorney-client  
law office

"law office"

attorney client communication

"attorney client communication"

law offices

"law offices"

attorney-client communication

"attorney-client communication"

lawsuit

A/C privileged

"A/C privileged"

lawyer

"attorney work product"

confidential

"legal advice"

counsel

paralegal

court

privilege

esq.

privileged

esquire

sensitive

judge

## Attorney Terms

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