

Exhibit E

Holland & Knight

31 West 52nd Street | New York, NY 10019 | T | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

Christine N. Walz
+1 212-513-3368
Christine.Walz@hklaw.com

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Susan Gillett
Office of General Counsel
National Archives and Records Administration
foia@nara.gov

Re: FREEDOM OF INFORMATION ACT REQUEST

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. section 552, we request access to and copies of the following FBI file, which we understand was transferred to NARA for historical value:

- Baltimore, [Maryland] - 157-3032-v.3 [Classification - Civil Unrest] -- John L Clark
 - National Archives Identifier: 5215329
 - Creator: [Department of Justice. Federal Bureau of Investigation. Baltimore \(Maryland\) Field Division. 1935 ?- \(Most Recent\)](#)
 - From: [Series: Classification 157 \(Civil Unrest\) Case Files, 1957 - 1978 Record Group 65: Records of the Federal Bureau of Investigation, 1896 - 2008](#)

Pursuant to 5 U.S.C. section 552 (a)(4)(A), I agree to pay a reasonable fee for the actual costs of reproducing and mailing the records requested.

Further, with the substantial increase in public interest in the Black Panthers, government surveillance, and police misconduct over the last year. The historical records that our client seeks have the potential to fill in gaps in the historical record and correct a racist narrative against the Black Panther Party that was propagated by various government agencies. It is imperative that the American public have access to these documents while the discussions of racism and accountability have the potential to inform movements for change. Specifically, with attention focused on these issues, the documents sought have the potential to inform the public debate and to contribute to legal proceedings for conviction integrity and exoneration of certain individuals

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associated with the Black Panthers. We, therefore, request that these FOIA requests be expedited to allow for the release of these critical documents. See 5 U.S.C. § 552(a)(6)(E)(v) (providing for expedited processing where there is a compelling need, including “urgency to inform the public concerning actual or alleged Federal Government activity”). In light of the overdue and paramount reckoning of racism and discrimination that the public and government alike have been addressing in the past year, Mr. Conte has shown a compelling need for expediting the records requested. Please expedite these requests and let us know when our client can expect to receive responses to these FOIA requests.

If the public records being requested contain information excluded from the provisions of the Freedom of Information Act, I request that the non-excluded material be segregated from the purportedly excluded material and that the non-excluded material be made available, in accordance with the provisions of 5 U.S.C. section 552(b).

Furthermore, if my request is denied in whole or part, pursuant to 5 U.S.C. section 552(a)(6)(F), I ask that you justify such denial and/or any deletions by reference to specific Code section that justifies the withholding of the records. See *Mobley v. C.I.A.*, 806 F.3d 568, 580 (D.C. Cir. 2015) (“The agency bears the burden of justifying the applicability of FOIA exemptions, which are exclusive and must be narrowly construed.” (citation omitted)).

I look forward to your response within 20 working days, as provided in 5 U.S.C. section 552 (a)(6)(A)(i). Please provide documents electronically to the extent they are available in that format to christine.walz@hklaw.com. If documents are not available electronically, they can be sent to me at the address listed above.

Thank you for your assistance.

Sincerely yours,

HOLLAND & KNIGHT LLP

Christine N. Walz

CNW