

# EXHIBIT A



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December 28, 2015

## FREEDOM OF INFORMATION ACT REQUEST

### By Electronic Mail and UPS Overnight Mail

FOIA/PA Mail Referral Unit  
Department of Justice  
Room 115, LOC Building  
Washington, D.C. 20530-00001  
[MRUFOIA.Requests@usdoj.gov](mailto:MRUFOIA.Requests@usdoj.gov)

Nelson D. Hermilla  
Chief, FOIA/PA Branch  
Civil Rights Division  
Department of Justice  
BICN Bldg., Room 3234  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530  
[CRT.FOIArequests@usdoj.gov](mailto:CRT.FOIArequests@usdoj.gov)

William E. Bordley  
Associate General Counsel  
Office of General Counsel  
United States Marshals Service  
FOIA/PA, CS4, 10th Floor  
Washington, DC 20530-1000  
[usms.foia@usdoj.gov](mailto:usms.foia@usdoj.gov)

**Re: FOIA Request for Information**

Dear FOIA Officer:

This firm represents Mario Woodward in connection with the action styled *State of Alabama v. Woodward*, 03-CC-2007-001388.60, which is pending in the Circuit Court of the State of Alabama, County of Montgomery (“State v. Woodward”). This request is submitted on behalf of Mr. Woodward (“Requester”), who is presently detained at the William E. Donaldson Correctional Facility.

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552 *et seq.* (“FOIA”) and corresponding regulations, we hereby request that we be allowed immediate access to the following documents (the “Records”) or, in the alternative, that we be immediately provided with copies of such Records:

- All records in any way relating to, pertaining to, or mentioning Department of Justice investigations of law enforcement located in the County of Montgomery, Alabama for civil rights violations during the time period of January 1, 1994 through today, December 28, 2015, including but not limited to investigations of the Montgomery Police Department or the Montgomery District Attorney’s Office.

FOIA Request  
December 28, 2015  
Page 2

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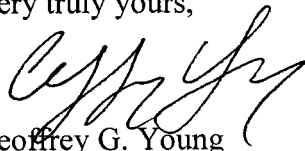
- All records in any way relating to, pertaining to, or mentioning the use of any cell phone tracking technology during the investigation of the shooting death of Officer Keith Houts on September 28, 2006, by state and/or federal law enforcement located in the State of Alabama and/or the State of Georgia, including but not limited to the use of any GPS or “stingray” technology by the Alabama Bureau of Investigations or the U.S. Marshalls located in Alabama and Georgia.

The Records are being requested in connection with Mr. Woodward’s defense of the above-referenced action. We agree to pay reasonable fees for the Record(s) and understand that we will be notified before fees are incurred only where fees apply. This request is segregable, such that if any part is denied, the remaining part of the request should be complied with.

Pursuant to FOIA, please respond in writing within 20 (twenty) business days of this letter. If you decide to withhold any record(s) or redact any information from the record(s), please state the legal basis and specific exemption for that decision.

Please contact me if I may expedite your office’s satisfaction of its obligations under FOIA, or otherwise address any of your questions or concerns.

Very truly yours,



Geoffrey G. Young

GGY:ao