

**EXHIBIT L**

December 18, 2019

**Via Email**

FOIA/PA Mail Referral Unit  
Department of Justice  
Room 115  
LOC Building  
Washington, DC 20530-0001  
civil.routing.FOIA@usdoj.gov



Dear DOJ FOIA Officer:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, I am writing to request that the Department of Justice (DOJ) provide me with certain records specified below in order to effectuate a transfer of ownership of part of consolidated FOIA request No. 145-FOI-16112 SBL:HDK. The relevant procedural history is as follows:

- On April 26, 2018, Thomson Reuters Court Express filed a FOIA request that was originally designated FOIA request No. DOJ-2018-004485 (attached as Exhibit A).
- On May 31, 2018, DOJ sent a letter (attached as Exhibit B) acknowledging that the request had been received on May 4, 2018 and stating that request had been assigned by DOJ to the “complex” FOIA track and consolidated with certain other requests as FOIA request No. 145-FOI-16112 SBL:HDK.
- On September 17, 2018, DOJ sent a letter (attached as Exhibit C) stating that records responsive to the request were protected from disclosure and would be withheld in full pursuant to 5 U.S.C. § 552(b)(7)(A).
- On November 2, 2018, Thomson Reuters Court Express timely appealed that decision. The appeal was assigned appeal number DOJ-AP-2019-000630 and is attached hereto as Exhibit D.
- On November 2, 2018, DOJ sent a letter (attached as Exhibit E) acknowledging receipt of the appeal.
- To date, Thomson Reuters Court Express has received no substantive response regarding the appeal.
- On October 23, 2019, Thomson Reuters Court Express held a telephone conference with DOJ representatives concerning the process for transferring ownership of the request to a third-party.

- On October 23, 2019, DOJ sent a letter (attached as Exhibit F) confirming that Thomson Reuters Court Express could effectuate a transfer of ownership by having the third-party submit a “new” FOIA request to DOJ.
- On October 23, 2019, DOJ sent an email (attached as Exhibit G) clarifying that the process of transferring ownership via filing a “new” FOIA request would not affect the processing of the appeal designated DOJ-AP-2019-000630, which “would continue to be processed as is,” *i.e.*, the timing of the appeal would not be affected by the transfer.
- On October 29, 2019, DOJ sent an email (attached as Exhibit H) confirming that DOJ “will process the new request under a new number and be treated the same as the prior request moving forward. The administrative appeal of DOJ’s partial denial of 145-FOI-16112, which was filed on November 2, 2018 and assigned number DOJ-AP-2019-000630, is with the office of information policy under appeal. That will go on as is in the appellate stage.”

I am the party to whom Thomson Reuters Court Express wishes to transfer the request originally designated DOJ-2018-004485, subsequently consolidated as 145-FOI-16112 SBL:HDK, and appealed as DOJ-AP-2019-000630. I understand that by filing this “new” FOIA request for the same materials, I will step into the shoes of Thomson Reuters Court Express and that my request will be (1) treated as having been received on April 26, 2018, (2) processed and denied on September 17, 2018, (3) appealed as of November 2, 2018, and (4) decided in the ordinary course, without additional delay as a result of this transfer.

As such, below are my “new” requests for DOJ records, which are verbatim the same as those previously requested by Thomson Reuters Court Express:

1. All interrogatories, requests for production, deposition notices, requests for admission, or other discovery requests either received or served by the government in *United States ex rel. Poehling v. United Health Group, Inc.*, No. 16-8697 (C.D. Cal.) (“*Poehling*”);
2. All interrogatory answers, deposition testimony, declarations or other sworn statements either received by the government or provided by the government or witnesses on behalf of the government (including, without limitation, expert witnesses or Rule 30(b)(6) designees) in the *Poehling* matter;
3. All expert reports either received or served by the government in the *Poehling* matter;
4. All other documents that were produced to or by the government in the *Poehling* matter, including custodian references;
5. All pleadings, court rulings, and other docket entries in the *Poehling* matter; and
6. All communications with the defendant(s) or defense counsel regarding potential or actual settlement of the *Poehling* matter.

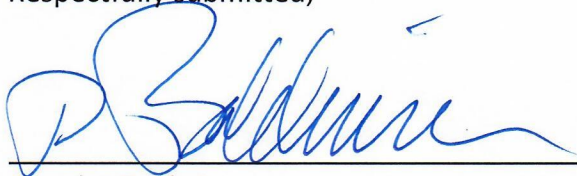


Please acknowledge receipt of these requests as soon as possible.

To help you determine the fees for responding to this FOIA request, I state that I am affiliated with a private business and am seeking information for use in the company's business. I am willing to pay fees for this request up to a maximum of \$300. If you estimate that the fees will exceed this limit, please so advise me.

Thank you for your kind assistance.

Respectfully submitted,



Douglas Baldwin

President

Douglas Baldwin & Associates

P.O. Box 1249

La Canada – Flintridge, CA 91012

Email: dba@pacbell.net

Phone: 818-952-4433

Attachments