

# EXHIBIT 3

# WILLKIE FARR & GALLAGHER LLP

787 Seventh Avenue  
New York, NY 10019-6099  
Tel: 212 728 8000  
Fax: 212 728 8111

March 5, 2019

**VIA Email (centcom.macdill.centcom-hq.mbx.freedom-of-information-act@mail.mil)**

United States Central Command (USCENTCOM)  
Freedom of Information Act (FOIA) Requester Service Center  
7115 South Boundary Boulevard  
MacDill AFB, FL 33621-5101  
(813) 529-6076

RE: Freedom of Information Act Request

Dear USCENTCOM FOIA Service Center,

This is a request under the Freedom of Information Act (5 U.S.C. § 552).

I, Michael Gottlieb, request a copy of the following records, files, reports, products, or other documents be provided to me pertaining to the Improvised Explosive Device (IED) attack (explosion) which occurred on May 8, 2007 in Baghdad, Iraq, in which the below listed soldier was killed in action. Please search the CENTCOM records for the below listed information in response to this request:

- a. Serious Incident Report(s) (SIRs) pertaining to this IED attack generated at the Battalion, Brigade, Division, MND, or Multi-National Force-Iraq (MNF-I) level.
- b. Explosive Ordinance Disposal (EOD)/Combined Explosive Exploitation Cell (CEXC) generated reports (storyboards) pertaining to this IED attack.
- c. Weapons Intelligence Team (WIT) report(s) generated by the WIT who investigated this IED attack.
- d. TF Troy reporting and/or analytic products pertaining to this IED attack.
- e. Combined Information Data Network Exchange (CIDNE) Significant Activity (SIGACT) report(s).
- f. CIDNE Improvised Explosive Device (IED) report(s).
- g. Composite Timeline report(s).
- h. IED Post Patrol Debrief (64-Liner) report(s).
- i. Battle Damage Assessment (BDA) report(s).
- j. Intelligence Directorate (S-2, G-2, and CJ-2) Operations WatchHighlights report(s).
- k. Intelligence Directorate (S-2, G-2, and CJ-2) Intelligence Summary (INTSUM) for the day of the IED attack and the following day.
- l. Multi National Division (MND)/Multi National Corps-Iraq (MNC-I) IED/EFP Update report(s).
- m. Multi-National Force-Iraq (MNF-I) Battle Update Assessment(s) (BUA) briefing slides.
- n. AR 15-6 Investigation report(s) and/or Command Directed Investigation (CDI) report(s).
- o. Medical Evacuation (MEDEVAC) Nine-Line transcript(s).
- p. MEDEVAC Assault Support Request(s) (ASR)
- q. Hospital casualty update report(s).
- r. Defense Casualty Information Processing System-Forward (DCIPS-CF) report(s).

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Soldier's Last Name: Blake  
Soldier's First Name: Stephens C.  
Soldier's SSN: [REDACTED]  
Rank: Sergeant  
Soldier's Unit: Headquarters and Headquarters Company, 3rd Brigade Combat Team,  
3rd Infantry Division  
Date of Incident: May 8, 2007  
Location of Death: Baghdad, Iraq  
Name of representative: Willkie Farr & Gallagher  
Relationship to Soldier: Attorneys for Family of Stephens C. Blake  
Mailing Address: 1875 K Street NW #100, Washington DC 20006

In order to help you determine my status for the purpose of assessing fees, please take notice that I am counsel for the family of Sergeant Stephens C. Blake in federal litigation currently pending before the U.S. District Court for the District of Columbia. Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

To discuss any aspect of this request, please contact me at (202) 303-1442, or via email at [mgottlieb@willkie.com](mailto:mgottlieb@willkie.com). Pursuant to 32 eCFR §286.5(c) my preference is to receive these records in their original native electronic format, and if that is not available, in PDF image format (one image per record, in color as applicable) through my email address. If the records prove too large to attach via email, my colleagues or I can provide a secure FTP link in which to upload the records.

Best regards,

Michael J. Gottlieb

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I, Michael Gottlieb, request a copy of the following records, files, reports, products, or other documents be provided to me pertaining to the Improvised Explosive Device (IED) attack (explosion) which occurred on March 29, 2008 in Baghdad, Iraq, in which the below listed soldier was wounded in action. Please search the CENTCOM records for the below listed information in response to this request:

- a. Serious Incident Report(s) (SIRs) pertaining to this IED attack generated at the Battalion, Brigade, Division, MND, or Multi-National Force-Iraq (MNF-I) level.
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r. Defense Casualty Information Processing System-Forward (DCIPS-CF) report(s).

Soldier's Last Name:	Hanley
Soldier's First Name:	Patrick Keith
Soldier's SSN:	[REDACTED]
Rank:	11B20 Combat Infantryman
Soldier's Unit:	10th Mountain Division
Date of Incident:	March 29, 2008
Location of Death:	Baghdad, Iraq
Name of representative:	Willkie Farr & Gallagher
Relationship to Soldier:	Attorneys for Patrick Keith Hanley
Mailing Address:	1875 K Street NW #1000, Washington DC 20006

In order to help you determine my status for the purpose of assessing fees, please take notice that I am counsel for Combat Infantryman Patrick Keith Hanley in federal litigation currently pending before the U.S. District Court for the District of Columbia. Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

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Best regards,

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Michael J. Gottlieb

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I, Michael Gottlieb, request a copy of the following records, files, reports, products, or other documents be provided to me pertaining to the Improvised Explosive Device (IED) attack (explosion) which occurred on August 6, 2007 in Baghdad, Iraq, in which the below listed soldier was killed in action. Please search the CENTCOM records for the below listed information in response to this request:

- a. Serious Incident Report(s) (SIRs) pertaining to this IED attack generated at the Battalion, Brigade, Division, MND, or Multi-National Force-Iraq (MNF-I) level.
- b. Explosive Ordinance Disposal (EOD)/Combined Explosive Exploitation Cell (CEXC) generated reports (storyboards) pertaining to this IED attack.
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Soldier's Last Name: Neiberger  
Soldier's First Name: Christopher T.  
Soldier's SSN: [REDACTED]  
Rank: Specialist  
Soldier's Unit: 1st BN, 18th Infantry Regiment, 2nd Brigade Combat Team, 1st Infantry Division  
Date of Incident: August 6, 2007  
Location of Death: Baghdad, Iraq  
Name of representative: Willkie Farr & Gallagher  
Relationship to Soldier: Attorneys for Family of Christopher T. Neiberger  
Mailing Address: 1875 K Street NW #1000, Washington DC 20006

In order to help you determine my status for the purpose of assessing fees, please take notice that I am counsel for the family of Specialist Christopher T. Neiberger in federal litigation currently pending before the U.S. District Court for the District of Columbia. Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

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Best regards,

Michael J. Gottlieb

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I, Michael Gottlieb, request a copy of the following records, files, reports, products, or other documents be provided to me pertaining to the Improvised Explosive Device (IED) attack (explosion) which occurred on September 22, 2007 in Baghdad, Iraq, in which the below listed soldier was killed in action. Please search the CENTCOM records for the below listed information in response to this request:

- a. Serious Incident Report(s) (SIRs) pertaining to this IED attack generated at the Battalion, Brigade, Division, MND, or Multi-National Force-Iraq (MNF-I) level.
- b. Explosive Ordinance Disposal (EOD)/Combined Explosive Exploitation Cell (CEXC) generated reports (storyboards) pertaining to this IED attack.
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- p. MEDEVAC Assault Support Request(s) (ASR)
- q. Hospital casualty update report(s).
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Soldier's Last Name: Reeves  
Soldier's First Name: Joshua H.  
Soldier's SSN: [REDACTED]  
Rank: Specialist  
Soldier's Unit: 2nd BN, 16th Infantry Regiment, 4th Brigade Combat Team, 1st Infantry Division  
Date of Incident: September 22, 2007  
Location of Death: Baghdad, Iraq  
Name of representative: Willkie Farr & Gallagher  
Relationship to Soldier: Attorneys for Family of Joshua H. Reeves  
Mailing Address: 1875 K Street NW #100, Washington DC 20006

In order to help you determine my status for the purpose of assessing fees, please take notice that I am counsel for the family of Specialist Joshua H. Reeves in federal litigation currently pending before the U.S. District Court for the District of Columbia. Your expedited treatment of this FOIA request is appreciated, as these materials are relevant to pending claims in this litigation.

I am willing to pay fees for this request up to a maximum of \$250. If you estimate that fees will exceed this limit, please inform my office prior to incurring additional costs.

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