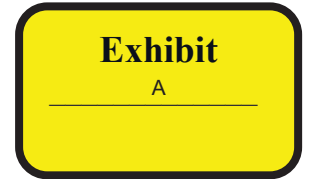


From: [Loper, Charlotte](#)
To: [Miller, Emily K. \(TAX\)](#); [Sasarak, Stephanie A. \(TAX\)](#); [Sergi, Joseph A. \(TAX\)](#); [Hunsader, Joseph E. \(TAX\)](#); [Morton, Benton T. \(TAX\)](#)
Cc: [Narwold, Bill](#); [Oliver, Meghan](#); [Bobbitt, Ebony](#); [Ruble, Laura](#); [Allen Buckley](#)
Subject: [EXTERNAL] RE: Steele - Confidential Documents
Date: Wednesday, May 11, 2022 10:39:05 AM

Thank you, Emily.

Charlotte Loper | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9287 | f. 843.216.9430 | cloper@motleyrice.com



From: Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>
Sent: Wednesday, May 11, 2022 10:22 AM
To: Loper, Charlotte <cloper@motleyrice.com>; Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>; Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>
Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>
Subject: RE: Steele - Confidential Documents

CAUTION:EXTERNAL

Charlotte,

As to USA-0020666 and USA-0020897, we just heard back from Accenture and they are retaining their confidentiality designations on those documents. They have asked for us to please file them under seal.

Emily K. Miller
Trial Attorney
United States Department of Justice, Tax Division
P.O. Box 227
Washington, DC 20044
emily.k.miller@usdoj.gov

CONFIDENTIALTY NOTE: This email and attachments are confidential. If you are not the intended recipient, be aware that any disclosure, copying, distribution, or use of this email is prohibited. If you have received this email in error, please notify the sender immediately and delete this copy and the reply from your system. Thank you.

From: Loper, Charlotte <cloper@motleyrice.com>

Sent: Wednesday, May 11, 2022 10:07 AM

To: Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>; Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>
Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>

Subject: [EXTERNAL] RE: Steele - Confidential Documents

Thank you, Stephanie. Please let us know if you hear anything from Accenture before the filing deadline. Just to confirm, the United States does not object to removing the designations on USA-0020666 and USA-0020897, but are maintaining the confidential designations unless Accenture agrees that they can be removed?

Charlotte Loper | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9287 | f. 843.216.9430 | cloper@motleyrice.com

From: Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>

Sent: Wednesday, May 11, 2022 9:53 AM

To: Loper, Charlotte <cloper@motleyrice.com>; Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>
Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>

Subject: RE: Steele - Confidential Documents

CAUTION:EXTERNAL

Charlotte:

After conferring with our client and Booz Allen, the United States does not object to lifting the confidential designation on USA-0009018 and USA-0009085. We have not heard back from Accenture yet so we believe the other two documents must remain confidential until we hear otherwise from Accenture.

Thanks,

Stephanie Sasarak
Trial Attorney
U.S. Department of Justice, Tax Division
Eastern Region
P.O. Box 227, Ben Franklin Station

Washington, DC 20044

Office: 202-307-2089

Cell: 202-598-3701

Fax: 202-514-6866

Stephanie.A.Sasarak@usdoj.gov

Address for USPS Mail:

One Constitution Square

1275 1st Street, NE

Washington, DC 20530

Address for Overnight or Worldwide Deliveries:

One Constitution Square

1275 1st Street, NE

Washington, DC 20002

From: Loper, Charlotte <cloper@motleyrice.com>

Sent: Friday, May 6, 2022 1:48 PM

To: Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>; Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>

Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>

Subject: [EXTERNAL] RE: Steele - Confidential Documents

Thank you, Stephanie.

Charlotte Loper | Attorney at Law | Motley Rice LLC
28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
o. 843.216.9287 | f. 843.216.9430 | cloper@motleyrice.com

From: Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>

Sent: Friday, May 6, 2022 1:11 PM

To: Loper, Charlotte <cloper@motleyrice.com>; Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>

Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>

Subject: RE: Steele - Confidential Documents

CAUTION:EXTERNAL

Charlotte: We have sent emails to counsel for Booz Allen for the first two documents and counsel for Accenture for the last two documents seeking their views regarding whether the documents should remain confidential.

Thanks,
Stephanie Sasarak
Trial Attorney
U.S. Department of Justice, Tax Division
Eastern Region
P.O. Box 227, Ben Franklin Station
Washington, DC 20044
Office: 202-307-2089
Cell: 202-598-3701
Fax: 202-514-6866
Stephanie.A.Sasarak@usdoj.gov

Address for USPS Mail:

One Constitution Square
1275 1st Street, NE
Washington, DC 20530

Address for Overnight or Worldwide Deliveries:

One Constitution Square
1275 1st Street, NE
Washington, DC 20002

From: Loper, Charlotte <cloper@motleyrice.com>
Sent: Thursday, May 5, 2022 6:57 PM
To: Sergi, Joseph A. (TAX) <Joseph.A.Sergi@usdoj.gov>; Hunsader, Joseph E. (TAX) <Joseph.E.Hunsader@usdoj.gov>; Miller, Emily K. (TAX) <Emily.K.Miller@usdoj.gov>; Sasarak, Stephanie A. (TAX) <Stephanie.A.Sasarak@usdoj.gov>; Morton, Benton T. (TAX) <Benton.T.Morton@usdoj.gov>
Cc: Narwold, Bill <bnarwold@motleyrice.com>; Oliver, Meghan <moliver@motleyrice.com>; Bobbitt, Ebony <ebobbitt@motleyrice.com>; Rublee, Laura <lrublee@motleyrice.com>; Allen Buckley <ab@allenbuckleylaw.com>
Subject: [EXTERNAL] Steele - Confidential Documents

All,

We are planning to include the following confidential documents as exhibits to our summary judgment opposition:

Bates/Documents	Exhibit	Designation
USA-0009018		Confidential
USA-0009085	53	Confidential
USA-0020666	75	Confidential
USA-0020897	144	Confidential

We are reaching out, pursuant to Local Rule 7(m), to ask whether the United States intends to defend all of its confidentiality designations, or if it would be willing to withdraw or narrow any of them (i.e., permit the public filing of a redacted version of any of the documents while the fully unredacted version will be filed under seal). If the United States chooses to stand on its designations, we will not file the documents publicly, but instead will file them under seal. We are available to discuss if needed.

Thank you,

Charlotte

Charlotte Loper | Attorney at Law | Motley Rice LLC
 28 Bridgeside Blvd. | Mt. Pleasant, SC 29464
 o. 843.216.9287 | f. 843.216.9430 | cloper@motleyrice.com

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