

Sam Nunberg

**ATTACHMENT**  
(Grand Jury Subpoena dated February 27, 2018)

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**INSTRUCTIONS:**

1. In complying with this subpoena, you are required to produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agent, employee or representative acting on your behalf. You are also required to produce documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody or control of any third party.
2. No documents called for by this request shall be destroyed, modified, removed, transferred, or otherwise made inaccessible to the grand jury. If you have knowledge that any subpoenaed document has been destroyed, discarded or lost, identify the subpoenaed document and provide an explanation of the destruction, discarding, loss, or disposal, and the date at which the document was destroyed, discarded, or lost.
3. This subpoena is continuing in nature. Any document not produced because it has not been located or discovered by the return date shall be provided immediately upon location or discovery subsequent thereto with an explanation of why it was not located or discovered until the return date.
4. If you believe any responsive documents are protected by a privilege, please provide a privilege log which (1) identifies any and all responsive documents to which the privilege is asserted, (2) sets forth the date, type, addressee(s), author(s), general subject matter, and indicated or known circulation of the document, and (3) states the privilege asserted in sufficient detail to ascertain the validity of the claim of privilege.
5. Production with respect to each document shall include all electronic versions and data files from email applications, as well as from word processing, spreadsheet, database, or other electronic data repositories applicable to any attachments, and shall be provided to the grand jury where possible in its native file format and shall include all original metadata for each electronic documents or data file.

**DEFINITIONS:**

1. The term “document” means all materials, whether drafts or unfinished versions, originals or nonconforming copies thereof, however created, produced or stored (manually, mechanically, electronically or otherwise), and by whomever prepared, produced, sent, dated or received, including but not limited to books, papers, files, notes, minutes, summaries, analyses, electronic

mail ("email"), correspondence, memoranda, written communications, work papers, ledger sheets, confirmations, invoices, account statements, reports, wires, telegrams, telexes, telephone logs, notes or records of conversations or meetings, contracts, agreements, calendars, date books, work sheets, invoices, bills, records of payment, magnetic tape, video recordings, audio recordings, disks, diskettes, and other electronic media, microfilm, microfiche, storage devices, appointment books, diaries, notices and message slips, and records of any kind.

2. The terms "related" and "relating" with respect to any given subject means anything that constitutes, contains, embodies, reflects, identifies, concerns, states, refers to, deals with, or is in any manner whatsoever pertinent to the subject.
3. The terms "including" and "includes" are not intended to exclude other types of documents that are nevertheless responsive but not specifically identified.
4. Any reference to an entity includes any subsidiary, affiliate, successor-in-interest, or related corporate entity, as well as any employee, representative, contractor, affiliate, or vendor of such entity.

**DESCRIPTION OF RECORDS SOUGHT BY THIS SUBPOENA**

For the period , to the present, please provide all documents related to the following individuals:

1.
  2.
- Etc.
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**In lieu of appearance, all records produced can be directed, via overnight mail, to:**