

March 30, 2020

By E-Mail

Nicole McFarland
Legal Department
Metropolitan Correctional Center Brooklyn
150 Park Row,
New York, NY 10007

Re: United States v. CLIENT NAME, CASE CAPTION SDNY

Dear Ms. McFarland:

This letter is respectfully submitted pursuant to 28 C.F.R. §§ 16.21 – 16.29 and *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951).

The above-captioned case is a federal criminal prosecution in the Southern District of New York against Mr. CLIENT NAME, Register Number #####-###, who is currently detained at the MCC New York.

Through his undersigned counsel, Mr. CLIENT NAME has issued a subpoena, attached here, to MCC New York seeking a complete copy of his medical records from December 26, 2019 to today. These medical records are essential to presenting mitigation evidence in connection with Mr. CLIENT NAME's defense. Also enclosed is a current HIPAA-compliant form signed by Mr. CLIENT NAME.

We believe this letter satisfies our *Touhy* obligations. If you disagree, kindly contact the undersigned at your earliest possible convenience. **We will need these medical records on or before April 1, 2020.**

Thank you in advance for your kind assistance in this matter.

Sincerely,

/s/

ATTORNEY NAME

Tel:

Fax: