

November 12, 2019

By E-Mail

Nicole McFarland
Legal Department
Metropolitan Detention Center Brooklyn
80 29th Street
Brooklyn, NY 11232

Re: United States v. CLIENT NAME, CASE CAPTION

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 MDC Brooklyn.

Through his undersigned counsel, Mr. CLIENT NAME has issued a subpoena, attached here, to MDC Brooklyn seeking a complete copy of his medical records from March 19, 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 November 22, 2019.**

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

Sincerely,

/s/
ATTORNEY
Tel:
Fax: