

**Exhibit F:**

**Email Response to Request for Rule 26(f)  
Conference – Management Counsel**

**From:** [Benitez, Brigida](#)  
**To:** "[MLockerby@foley.com](#)"; "[jlamken@mololamken.com](#)"; "[Grover.Hartt@usdoj.gov](#)"; "[CMitchell@foley.com](#)"  
**Cc:** "[WDavis@foley.com](#)"; "[kphillips@actrightlegal.org](#)"; "[njohnson@actrightlegal.org](#)"  
**Subject:** Re: True the Vote v. IRS, 1:13-cv-00734 (D.D.C.): Request for FRCP 26(f) Conference  
**Date:** Friday, March 28, 2014 3:02:04 PM

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We also agree with the government.

Regards,

Brigida

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**From:** MLockerby@foley.com [mailto:MLockerby@foley.com]  
**Sent:** Friday, March 28, 2014 11:47 AM US Mountain Standard Time  
**To:** 'Lamken, Jeffrey' <jlamken@mololamken.com>; Hartt, Grover (TAX) <Grover.Hartt@usdoj.gov>; CMitchell@foley.com <CMitchell@foley.com>; Benitez, Brigida  
**Cc:** WDavis@foley.com <WDavis@foley.com>; Kaylan Phillips <kphillips@actrightlegal.org>; Noel Johnson (njohnson@actrightlegal.org) <njohnson@actrightlegal.org>  
**Subject:** RE: True the Vote v. IRS, 1:13-cv-00734 (D.D.C.): Request for FRCP 26(f) Conference

That seems to be the safer course of action under the current regime.

#### Michael J. Lockerby

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**From:** Lamken, Jeffrey [mailto:jlamken@mololamken.com]  
**Sent:** Friday, March 28, 2014 2:46 PM  
**To:** Hartt, Grover (TAX); Mitchell, Cleta; 'bbenitez@steptoe.com'  
**Cc:** Davis, William E.; Lockerby, Michael J.; Kaylan Phillips; Noel Johnson (njohnson@actrightlegal.org)  
**Subject:** RE: True the Vote v. IRS, 1:13-cv-00734 (D.D.C.): Request for FRCP 26(f) Conference

We agree with the government.

Best regards,

Jeff

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**From:** Hartt, Grover (TAX) [<mailto:Grover.Hartt@usdoj.gov>]  
**Sent:** Friday, March 28, 2014 2:42 PM  
**To:** [CMitchell@foley.com](mailto:CMitchell@foley.com); Lamken, Jeffrey; 'bbenitez@steptoe.com'  
**Cc:** [WDavis@foley.com](mailto:WDavis@foley.com); [MLockerby@foley.com](mailto:MLockerby@foley.com); Kaylan Phillips; Noel Johnson ([njohnson@actrightlegal.org](mailto:njohnson@actrightlegal.org))  
**Subject:** RE: True the Vote v. IRS, 1:13-cv-00734 (D.D.C.): Request for FRCP 26(f) Conference

Cleta,

Until the Court has ruled on the pending motions to dismiss, we believe it would be premature to schedule a Rule 26(f) conference.

Grover

Grover Hartt, III  
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Department of Justice Tax Division  
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**From:** [CMitchell@foley.com](mailto:CMitchell@foley.com) [<mailto:CMitchell@foley.com>]  
**Sent:** Friday, March 28, 2014 10:39 AM  
**To:** Hartt, Grover (TAX); Lamken, Jeffrey ([jlamken@mololamken.com](mailto:jlamken@mololamken.com)); 'bbenitez@steptoe.com'  
**Cc:** [WDavis@foley.com](mailto:WDavis@foley.com); [MLockerby@foley.com](mailto:MLockerby@foley.com); Kaylan Phillips; Noel Johnson ([njohnson@actrightlegal.org](mailto:njohnson@actrightlegal.org))  
**Subject:** True the Vote v. IRS, 1:13-cv-00734 (D.D.C.): Request for FRCP 26(f) Conference

Counsel, I know we are all awaiting the judge's ruling(s) on your MTDs, but realized we should probably proceed to conduct the FRCP 26(f) conference. What would be your availability to participate in such a conference? Would next Friday, April 4 work?

We would suggest 10 am EDT, but if there is another time that would work better for others, let me know. Once we agree on a date/time, I will circulate a dial-in number.

Thanks. Cleta

Cleta Mitchell, Esq.  
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[cmitchell@foley.com](mailto:cmitchell@foley.com)

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