

# **EXHIBIT 7**

## Katherine Aizpuru

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**From:** Ryan Stonerock <RStonerock@harderllp.com>  
**Sent:** Tuesday, July 23, 2019 12:05 AM  
**To:** Hassan Zavareei  
**Cc:** JBennett@publicjustice.net; KGilbride@publicjustice.net; Katherine Aizpuru; bwarwick@varnellandwarwick.com; PBLAND@publicjustice.net; jvarnell@varnellandwarwick.com; DSiler-Nixon@fordharrison.com; TJAENSCH@fordharrison.com; Charles Harder; Henry Self; Steven Frackman  
**Subject:** RE: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Mr. Zavareei:

For the reasons previously stated in my July 18 email and July 20 letter, we will not respond to your requests below.

To reiterate for at least the third time, we have already produced the full, unaltered video to your office, and filed it with the Court. Moreover, Mr. Hayes submitted a sworn declaration stating, in pertinent part, that the video produced to your office and filed with the Court “is a true and correct copy of my audiovisual recording of [the August 24, 2016 encounter between Ms. Johnson and Mr. Trump], which has not been edited or otherwise altered in any way.” This video unequivocally demonstrates that there was no battery whatsoever, and that Ms. Johnson’s battery claim was frivolous from the outset. As a result, responses to your requests are unnecessary and would be a further waste of time and resources.

Please be advised that we will vigorously oppose any motion to reopen discovery and adjourn Ms. Johnson’s current deadline to file an amended complaint until after we respond to her new purported discovery.

Sincerely,



**RYAN J. STONEROCK**  
HARDER LLP  
[RSTONEROCK@HARDERLLP.COM](mailto:RSTONEROCK@HARDERLLP.COM)  
(424) 203-1600

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**From:** Hassan Zavareei <hzavareei@tzlegal.com>  
**Sent:** Monday, July 22, 2019 7:55 PM  
**To:** Ryan Stonerock <RStonerock@harderllp.com>  
**Cc:** JBennett@publicjustice.net; KGilbride@publicjustice.net; Katherine Aizpuru <kaizpuru@tzlegal.com>; bwarwick@varnellandwarwick.com; PBLAND@publicjustice.net; jvarnell@varnellandwarwick.com; DSiler-Nixon@fordharrison.com; TJAENSCH@fordharrison.com; Charles Harder <charder@harderllp.com>; Henry Self <hself@harderllp.com>; Steven Frackman <sfrackman@harderllp.com>  
**Subject:** Re: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Ryan,

I have not heard from you. Will you agree to these three requests?

Thanks,

Hassan

Hassan A. Zavareei  
Tycko & Zavareei LLP  
1828 L Street, NW  
Suite 1000  
Washington, DC 20036  
(202) 973-0900  
(202) 973-0950 (facsimile)  
[hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com)  
@hzavareei

On Jul 22, 2019, at 2:46 PM, Hassan Zavareei <[hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com)> wrote:

Ryan,

Thank you for talking with us today. I am writing to respond to your request that we try to narrow our requests. In an effort to avoid the need for a motion, we can limit our requests to the following three items:

1. Please send us the original full video you received from Bryan Hayes with metadata, together with the originals (with metadata) of any other videos or photos from his phone from that day.
2. Please let us know if there are any other videos/photographs from inside the RV on August 24, 2016, and if so please produce them to us.
3. Please tell us the date defense counsel received the video from Mr. Hayes.

I hope that this is acceptable, and I ask that you get back to us by the close of business today.

Regards,

Hassan

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<image004.jpg>Hassan Zavareei ■ TYCKO & ZAVAREEI LLP ■ [www.tzlegal.com](http://www.tzlegal.com)  
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**From:** Ryan Stonerock <[RStonerock@harderllp.com](mailto:RStonerock@harderllp.com)>  
**Sent:** Monday, July 22, 2019 12:01 PM  
**To:** Hassan Zavareei <[hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com)>

**Cc:** [JBennett@publicjustice.net](mailto:JBennett@publicjustice.net); [KGilbride@publicjustice.net](mailto:KGilbride@publicjustice.net); Katherine Aizpuru <[kaizpuru@tzlegal.com](mailto:kaizpuru@tzlegal.com)>; [bwarwick@varnellandwarwick.com](mailto:bwarwick@varnellandwarwick.com); [PBLAND@publicjustice.net](mailto:PBLAND@publicjustice.net); [jvarnell@varnellandwarwick.com](mailto:jvarnell@varnellandwarwick.com); [DSiler-Nixon@fordharrison.com](mailto:DSiler-Nixon@fordharrison.com); [TJAENSCH@fordharrison.com](mailto:TJAENSCH@fordharrison.com); Charles Harder <[charder@harderllp.com](mailto:charder@harderllp.com)>; Henry Self <[hself@harderllp.com](mailto:hself@harderllp.com)>; Steven Frackman <[sfrackman@harderllp.com](mailto:sfrackman@harderllp.com)>  
**Subject:** RE: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Mr. Zavareei:

I am available today beginning at 11 am PT. Please let me know what time works best for you.

Thanks,

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<image003.jpg>

**RYAN J. STONEROCK**  
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[RSTONEROCK@HARDERLLP.COM](mailto:RSTONEROCK@HARDERLLP.COM)  
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**From:** Hassan Zavareei <[hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com)>  
**Sent:** Saturday, July 20, 2019 9:24 AM  
**To:** Ryan Stonerock <[RStonerock@harderllp.com](mailto:RStonerock@harderllp.com)>  
**Cc:** [JBennett@publicjustice.net](mailto:JBennett@publicjustice.net); [KGilbride@publicjustice.net](mailto:KGilbride@publicjustice.net); Katherine Aizpuru <[kaizpuru@tzlegal.com](mailto:kaizpuru@tzlegal.com)>; [bwarwick@varnellandwarwick.com](mailto:bwarwick@varnellandwarwick.com); [PBLAND@publicjustice.net](mailto:PBLAND@publicjustice.net); [jvarnell@varnellandwarwick.com](mailto:jvarnell@varnellandwarwick.com); [DSiler-Nixon@fordharrison.com](mailto:DSiler-Nixon@fordharrison.com); [TJAENSCH@fordharrison.com](mailto:TJAENSCH@fordharrison.com); Charles Harder <[charder@harderllp.com](mailto:charder@harderllp.com)>; Henry Self <[hself@harderllp.com](mailto:hself@harderllp.com)>; Steven Frackman <[sfrackman@harderllp.com](mailto:sfrackman@harderllp.com)>  
**Subject:** Re: Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Thanks Ryan. Please let me know when you or someone else from your team is available to meet and confer on Monday. I think our questions are pretty simple. Hopefully we can talk through this and obviate the need for a motion. But if not we will have to seek relief from the Court.

Hassan

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On Jul 20, 2019, at 12:08 PM, Ryan Stonerock <[RStonerock@harderllp.com](mailto:RStonerock@harderllp.com)> wrote:

Mr. Zavareei:

Please see the attached letter.

Best,

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<image003.jpg>

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**From:** Nicole Porzenheim <[nporzenheim@tzlegal.com](mailto:nporzenheim@tzlegal.com)>  
**Sent:** Friday, July 19, 2019 12:31 PM  
**To:** Ryan Stonerock <[RStonerock@harderllp.com](mailto:RStonerock@harderllp.com)>  
**Cc:** Charles Harder <[charder@harderllp.com](mailto:charder@harderllp.com)>; [JBennett@publicjustice.net](mailto:JBennett@publicjustice.net);  
[KGilbride@publicjustice.net](mailto:KGilbride@publicjustice.net); Katherine Aizpuru <[kaizpuru@tzlegal.com](mailto:kaizpuru@tzlegal.com)>;  
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[TJAENSCH@fordharrison.com](mailto:TJAENSCH@fordharrison.com); Hassan Zavareei <[hzavareei@tzlegal.com](mailto:hzavareei@tzlegal.com)>  
**Subject:** Johnson v. Trump - Case Number 8:19-cv-00475-WFJ-SPF

Counsel,

Please find the attached.

Best,

<image005.jpg> **Nicole Porzenheim** ■ Paralegal ■ TYCKO & ZAVAREEI  
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<RJS to Hassan Zavareei re. Reopening Discovery 07.20.19.pdf>