

# Exhibit 2

**From:** Sandick, Harry (x2723)  
**Sent:** Wednesday, November 15, 2017 6:05 PM  
**To:** 'carol.federighi@usdoj.gov'; 'Elizabeth.shapiro@usdoj.gov'; 'joseph.borson@usdoj.gov'; 'Kristina.wolfe@usdoj.gov'  
**Cc:** Friedman, Daniel (x2378); Melanie Sloan; Austin Evers; John Bies; Ruzumna, Daniel (x2034)  
**Subject:** Dunlap v. Presidential Advisory Commission on Election Integrity, No. 17-cv-2361 (D.D.C.)  
**Attachments:** Proposed order - DRAFT.PDF  
**FilingDate:** 11/15/2017 11:05:00 PM

Dear Ms. Federighi:

I represent Secretary of State Matt Dunlap in the above-captioned case involving the Presidential Advisory Commission on Election Integrity ("Commission"). I am writing to follow up on the letter I sent yesterday. Please confirm that you represent Defendants in this matter.

Secretary Dunlap has requested documents and information about the Commission's activities from the Commission's Designated Federal Officer, Andrew Kossack, numerous times over the past month. I renewed those requests on behalf of Secretary Dunlap in my letter to you. Secretary Dunlap and I have not received any documents or even promises to produce documents in response to these requests.

To protect his rights, Secretary Dunlap is planning to file a motion for a preliminary injunction tomorrow. We believe a motion has a strong chance of being granted. In our papers, we plan to make the following arguments: The Federal Advisory Committee Act and the D.C. Circuit's binding precedent in *Cummock v. Gore*, 180 F.3d 282 (D.C. Cir. 1999), give a commissioner a clear right to obtain documents made available to or prepared for or by an advisory committee like the Commission. Secretary Dunlap will be irreparably harmed if commissioners and staff continue to work without Secretary Dunlap and if additional meetings are scheduled without granting Secretary Dunlap access to Commission documents. We have been unable to identify any harm the Commission would face from complying with FACA and it the public interest would be served by Secretary Dunlap's full participation in the Commission's work and deliberations.

As a courtesy, I am providing the proposed order that we plan to submit in connection with the motion. Please let me know no later than 11:00 a.m. tomorrow if the Commission and the other defendants are willing to stipulate to the relief sought in whole or in part such that Secretary Dunlap's motion can be avoided.

Regards,

Harry Sandick

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