

William Trask

From: Joseph Podraza
Sent: Thursday, August 13, 2020 11:05 AM
To: Ellen Berkowitz; William Trask
Cc: Joseph Podraza
Subject: RE: Greenberg

Thanks. We'll take the lead in obtaining a copy of the FBI report for both of us and will keep you posted on our progress. In the interim, anything you can do to expedite our receipt of a copy of the videotape and 911 recording would be greatly appreciated. Joe

From: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>
Sent: Thursday, August 13, 2020 10:22 AM
To: Joseph Podraza <jpodraza@lambmcerlane.com>; William Trask <wtrask@lambmcerlane.com>
Subject: RE: Greenberg

You are welcome to request their file.

Ellen Berkowitz
Senior Attorney
City of Philadelphia Law Department
Affirmative & General Litigation Group -- Pensions
1515 Arch Street, 15th Floor
Philadelphia, PA 19102
215-683-5253
215-683-5069 (fax)

From: Joseph Podraza <jpodraza@lambmcerlane.com>
Sent: Thursday, August 13, 2020 10:07 AM
To: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>; William Trask <wtrask@lambmcerlane.com>
Cc: Joseph Podraza <jpodraza@lambmcerlane.com>
Subject: RE: Greenberg

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Understand. But I believe they would supply you with their file or, at a minimum, provide a copy of the FBI report if you requested it from them. Alternatively, the FBI Lab will supply a copy of its report to you upon request. Thanks. Joe

From: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>
Sent: Thursday, August 13, 2020 10:02 AM
To: Joseph Podraza <jpodraza@lambmcerlane.com>; William Trask <wtrask@lambmcerlane.com>
Subject: RE: Greenberg

The AG's office did not provide their file to me.

Ellen Berkowitz
Senior Attorney
City of Philadelphia Law Department

Affirmative & General Litigation Group -- Pensions
1515 Arch Street, 15th Floor
Philadelphia, PA 19102
215-683-5253
215-683-5069 (fax)

From: Joseph Podraza <jpodraza@lambmcerlane.com>
Sent: Thursday, August 13, 2020 9:43 AM
To: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>; William Trask <wtrask@lambmcerlane.com>
Cc: Joseph Podraza <jpodraza@lambmcerlane.com>
Subject: RE: Greenberg

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Ellen:

Thank you for your response. Please do whatever can be done to expedite our receipt of the discrete items identified in my below email. Also, we would appreciate if you would call the AG's office to obtain a copy of the FBI report for them in the event it is no longer in the possession of the PPD, MEO, or other City agency. Joe

From: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>
Sent: Thursday, August 13, 2020 9:38 AM
To: Joseph Podraza <jpodraza@lambmcerlane.com>; William Trask <wtrask@lambmcerlane.com>
Subject: RE: Greenberg

Hi – I am back in Philadelphia and digging out, and as soon as I have access to the files, I will begin sending them over. But I can't give you a date by which I'll be able to give you those particular items, because since they're on my computer it's not a matter of rummaging through folders – it's actually more difficult than if they were physical objects in labeled folders.. I'm not even sure if I have all of those items – the FBI reports may be in the possession of the AG (again, I don't know). While you have been patient, please understand that all of our cases have been pushed back.

Ellen.

Ellen Berkowitz
Senior Attorney
City of Philadelphia Law Department
Affirmative & General Litigation Group -- Pensions
1515 Arch Street, 15th Floor
Philadelphia, PA 19102
215-683-5253
215-683-5069 (fax)

From: Joseph Podraza <jpodraza@lambmcerlane.com>
Sent: Thursday, August 13, 2020 9:10 AM
To: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>; William Trask <wtrask@lambmcerlane.com>
Cc: Joseph Podraza <jpodraza@lambmcerlane.com>
Subject: RE: Greenberg

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

Ellen:

Hope all is well. I email to request that you provide us with a date by which we may expect receipt of at least the videotape, the 911 call, and a copy of the FBI analysis of/report on the hard-drives of Ellen's personal and work laptops. I believe we have been very patient to date and reasonable in working with you on proceeding with discovery given the pandemic and your personal needs. However, it is very important that we now proceed promptly on receiving at least these very discrete discovery items. Thanks. Joe

From: Joseph Podraza

Sent: Monday, July 20, 2020 9:09 AM

To: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>; William Trask <wtrask@lambmcerlane.com>

Cc: Joseph Podraza <jpodraza@lambmcerlane.com>

Subject: RE: Greenberg

Ellen:

Any update on this? We are particularly interested in viewing the videotape, hearing the 911 call, reviewing the forensic lab report from the FBI lab to the PPD, and the PPD's docs. To avoid delay, we will treat these materials as confidential while we complete a protective order agreement. If possible could we pick up some or all of these materials this week? Thanks. Joe

From: Ellen Berkowitz <Ellen.Berkowitz@phila.gov>

Sent: Monday, June 29, 2020 5:53 PM

To: Joseph Podraza <jpodraza@lambmcerlane.com>; William Trask <wtrask@lambmcerlane.com>

Subject: Greenberg

Hi –

I hope you two are weathering this well.

I should in the not-too-distant future be able to send along materials from the ME's office, but I wanted to let you know that I am headed to Pittsburgh for a couple of weeks because my father is having heart surgery. I just wanted to let you know that, and ask for your continued patience.

Thank you.

Ellen.

Ellen Berkowitz
Senior Attorney
City of Philadelphia Law Department
Affirmative & General Litigation Group -- Pensions
1515 Arch Street, 15th Floor
Philadelphia, PA 19102
215-683-5253
215-683-5069 (fax)

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the Individual(s) named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering this to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify us by telephone at 610.430.8000 or notify us by e-mail at info@lambmcerlane.com.

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the Individual(s) named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering this to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify us by telephone at 610.430.8000 or notify us by e-mail at info@lambmcerlane.com.

This e-mail contains PRIVILEGED AND CONFIDENTIAL INFORMATION intended only for the use of the Individual(s) named above. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering this to the intended recipient, you are hereby notified that any dissemination or copying of this e-mail is strictly prohibited. If you have received this e-mail in error, please immediately notify us by telephone at 610.430.8000 or notify us by e-mail at info@lambmcerlane.com.