



U.S. Department of Justice

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November 2, 2023

VIA EMAIL

Neil Anand
1313 Cheltenham Drive
Bensalem, PA 19020
cardiacgasman@gmail.com

RE: Anand v. Dept. of Justice, et al., Civil No. 22-2982

Dear Mr. Anand:

We have received Plaintiff's Requests for Admissions to Defendants, which was served, by email, October 3, 2023.

Under the Federal Rule of Civil Procedure, “[a] party may not seek discovery from any source before the parties have conferred as required by Rule 26(f), except in a proceeding exempted from initial disclosure under Rule 26(a)(1)(B), or when authorized by these rules, by stipulation, or by court order.” Fed. R. Civ. P. 26(d)(1) (emphasis added); *see also* Fed. R. Civ. P. 26(d)(2)(B) and 34(b)(2)(A) (responses to prematurely served requests not due until 30 days after the first Rule 26(f) conference).

As you are aware, the Court has not yet ordered the parties to conduct a Rule 26(f) conference and will likely not do so until it schedules a Rule 16 conference. Therefore, the United States objects to Plaintiff's Requests for Admissions and will not be serving any responses to Plaintiff's prematurely served discovery requests. Rather, the parties can discuss the timing for serving and responding to discovery during their Rule 26(f) conference.

Please contact me with any questions.

Sincerely,

JACQUELINE C. ROMERO
United States Attorney

/s/ Fernando I. Rivera
FERNANDO I. RIVERA