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VIA E-MAIL ONLY to acelli@ccbawm.com

Andrew G. Celli, Jr.
Emery Celli Brinckerhoff Abady Ward & Maazel LLP
600 Fifth Ave., 10th Floor
New York NY 10020
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RE: Independent Investigation into the City of Rochester's Response to and Handling of the RPD's March 23, 2020 Use of Force Against Daniel Prude

Dear Mr. Celli:

I reply to your e-mail received Tuesday afternoon. Thank you for your prompt and short answer to my request. I am still seeking your longer answer to my request:

Please direct me and Mr. Getz to the sources of authority to compel production and testimony from an individual who is not employed by the City of Rochester.

In other words., the statute, code or regulation that authorizes the judicial enforcement of the subpoena power authorized by City Counsel to your law firm. You can elect to provide this longer answer to my request now or you can elect to present your authority to a court of competent jurisdiction.

Thank you.

Very truly yours,


Michael J. Tallon

MJT/jgd
cc: La'Ron D. Singletary
Jon P. Getz, Partner (jgetz@vaheygetz.com)