

Exhibit 59

From: [Ahmed, Sameer](#)
To: [Donohue, Anne P \(CIV\)](#); [Kanter, Ethan \(CIV\)](#); [Kipnis, Brian \(USAWAW\)](#); [Murphy, Lindsay M. \(CIV\)](#); [Evans, Manning \(CIV\)](#); [Moore, Brendan T. \(CIV\)](#); [Busen, Jesse \(CIV\)](#); [Slack, Michelle R \(CIV\)](#); [Braga, Victoria M. \(CIV\)](#); [Brinkman, Andrew \(CIV\)](#); [Taranto, Leon B. \(CIV\)](#); [Konkoly, Antonia \(CIV\)](#); [Saylor, Amanda \(CIV\)](#); [Charette, Kaitlyn \(CIV\)](#); [Flentje, August \(CIV\)](#)
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Subject: Wagafe v. Trump: PLAINTIFFS' FOURTH SUPPLEMENTAL INITIAL DISCLOSURES
Date: Wednesday, October 14, 2020 5:17:02 PM
Attachments: [2020-10-14 Plaintiffs' Fourth Supplemental Initial Disclosures FINAL.PDF](#)

Counsel,

Pursuant to the parties' agreement on August 12, 2020, please see attached Plaintiffs' Fourth Supplemental Initial Disclosures.

You will receive the production in a separate e-mail. The password for the production is:

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These disclosures are subject to the Attorneys' Eyes Only Protective Order. As a reminder, they can only be used "in connection with this case only for pursuing, defending, or attempting to settle this litigation" and cannot be used for any other purpose, including the adjudication of the notice responders' immigration benefit applications. Dkt. 86 at 4.

Sincerely,
Sameer

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