

A-304

AN EMAIL EXCHANGE BETWEEN DEFENDANT'S APPELLATE
COUNSEL, STEVEN FEINMAN AND ADA SUSAN GLINER THAT
OCCURRED ON NOVEMBER 19, 2019 TO NOVEMBER 20, 2019

Gliner, Susan
People v. Covlin
November 19, 2019 at 1:22 PM

(A-304 - A-306)



**I can confirm for you that the photo appearing on page 143
of the Power Point that we sent to you is People's Exhibit
262.**

This email communication and any files transmitted with it contain privileged and confidential information from the New York County District Attorney's Office and are intended solely for the use of the individuals or entity to whom it has been addressed. If you are not the intended recipient, you are hereby notified that any dissemination or copying of this email is strictly prohibited. If you have received this email in error, please delete it and notify the sender by return email.

Steven Feinman
Re: People v. Covlin
November 19, 2019 at 4:14 PM
Gliner, Susan

Thank you. However, you did not entirely answer my question. Is the photograph that was admitted into evidence as People's Exhibit 262 the same photograph that Mr. Bogdanos was referring to on page 4583 of the transcript when he stated at lines 15 to 22 the following:

"Next. Now let's put this photo up. Let's start normal. You know, this photo, this is a photo taken December 31st in the morning, right, 2009. Let's blow it up, please. Let's keep blowing it up. Let's keep blowing it up. Now stop. What is that? What's that wet stain? You look at other photos you see, much later, it's dry."

The transcript at page 4583 reflects that Mr. Bogdanos shows the jury People's Exhibit 262 at slide 72/212 and then shows the jury People's Exhibit 443 at slide 73/212. The next slide in the power point is slide 74/212. This slide is labeled as People's Exhibit 442-17 and is a surveillance camera photo of Ms. Covlin on her cell phone walking in the hallway of the building. Therefore, when in the above quote Mr. Bogdanos says "[n]ext. Now let's put this photo up. . ." he clearly cannot be referring to People's Exhibit 442-17 at slide 74/212. It appears that he is referring to Exhibit 262 (slide 72/212) a second time and stating that the photo was taken in the morning on December 31, 2009. However, the transcript at page 2293 and the People's exhibit list indicate that People's Exhibit 262 was taken by Detective Brown in the afternoon at 2:17 pm on December 31, 2009. If Mr. Bogdanos was not referring to People's Exhibit 262 in the above quote, please inform me which Exhibit he is referring to.

Thank you.

Steven Feinman
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White Plains, New York 10601
sfeinman@feinmanlawfirm.com
(914) 949-8214

On Nov 19, 2019, at 1:23 PM, Gliner, Susan <GLINERS@dany.nyc.gov> wrote:

I can confirm for you that the photo appearing on page 143 of the Power Point that we sent to you is People's Exhibit 262.

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Gliner, Susan
RE: People v. Covlin
November 20, 2019 at 12:13 PM
Steven Feinman

Mr. Feinman: By confirming that the People's exhibit that appears on page 143 of the Power Point is, in fact, number 262, I believe I have satisfied my obligation of providing you with a complete account of the exhibits that the People introduced at trial. I cannot, however, provide you with an interpretation of the trial record. I leave it to you to make whatever claims that you feel necessary in the appellate brief that you file. Susan Gliner

From: Steven Feinman [mailto:sfeinman@feinmanlawfirm.com]
Sent: Tuesday, November 19, 2019 4:15 PM
To: Gliner, Susan <GLINERS@dany.nyc.gov>
Subject: Re: People v. Covlin

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