

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>, "[REDACTED]"  
(USANYS) <[REDACTED]>, "[REDACTED]"  
<[REDACTED]>

**Subject:** FW: [REDACTED]

**Date:** Thu, 29 Apr 2021 19:01:06 +0000

**Attachments:** 2021-04-30\_Gov't\_Letter\_to\_Manley.v3.docx

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Updated version attached. Let me know if you're good with this, and I'll send a pdf to defense counsel. FYI I've changed the cc line, since BSF is now in theory counsel of record in the case, and we're not sending this to them.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Thursday, April 29, 2021 2:45 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;  
[REDACTED] <[REDACTED]>  
**Subject:** RE: [REDACTED]

[REDACTED] nice work on this, my edits are attached.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Thursday, April 29, 2021 11:01 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;  
[REDACTED] <[REDACTED]>  
**Subject:** RE: [REDACTED]

In case it's useful while we're troubleshooting this issue today, I'm attaching the working draft. We'll let you know if we find additional authorities on this or obtain different guidance

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**From:** [REDACTED]  
**Sent:** Thursday, April 29, 2021 10:32 AM  
**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]  
[REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>;  
[REDACTED] <[REDACTED]>  
**Subject:** [REDACTED]

[REDACTED],

We're working on drafting a letter in response to the attached, and wanted to give you a heads up. We hope to have a draft for you this afternoon, in the hopes of sending the draft to defense counsel tonight as part of the meet-and-confer directed by Judge Nathan. I think that leaves sufficient time for filing tomorrow.

Although we're mindful of third party privacy interests, for non-parties who are neither witnesses nor victims in the case, I do have concerns about entertaining redaction/intervention requests, given the high volume of people who may ask to be heard or assert a right to review and redact documents if this were entertained.

Thanks,

EFTA00013434

[REDACTED]

[REDACTED]

Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

[REDACTED]