

From: "████████") <████████>
To: "████████") <████████>, "████████" (USANYS) <████████>,
"████████" <████████>
Subject: FW: ██████████

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

Attachments: 2021-04-30_Gov't_Letter_to_Manley.v3.docx

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.

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

████████ nice work on this, my edits are attached.

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

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

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

████████,
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

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