

**From:**

**To:**

**Cc:**

**Subject:** RE: Cite-checked omnibus MOL

**Date:** Fri, 26 Feb 2021 16:04:05 +0000

**Attachments:** 2021.02.26\_GM\_Omnibus\_Opposition\_to\_Defense\_Motions.rd.docx

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Team, truly excellent work on this. [REDACTED] and [REDACTED] split up our review, so I took pages 3-116 of the motion ([REDACTED] sections), and [REDACTED] is reviewing the rest. Two items to note – I tried to change subsequent cites to string cites where I caught them, but I wasn't reviewing closely for that, so make sure the paras are reviewing for that. Second, as I discussed with [REDACTED] please take a look at the redactions in her section. I tried to conform them to the general principal that redactions should apply to the subpoena and the ex parte proceeding, and un-redactions should apply to the description of the article, her brief making general allegations, and our indictment. If that's not how you are envisioning the redactions, happy to discuss.

Again, fantastic work. This is a very strong brief.

**From:**

**Sent:** Friday, February 26, 2021 4:08 AM

**To:**

**Cc:**

**Subject:** Cite-checked omnibus MOL

[REDACTED]

Attached please find the cite-checked omnibus memorandum of law in opposition to Maxwell's motions. The team will be working with the paralegals tomorrow to proofread (which will include cleaning up the TOA), get out the discovery that we reference in the MOL, and deal with redactions before filing. You'll see that we have highlighted portions that we tentatively expect to redact in green.

Thanks,

EFTA00018833