

From: [REDACTED]
To: [REDACTED] Menninger <[REDACTED]>
Cc: [REDACTED]
<[REDACTED]>, Jeff Pagliuca <[REDACTED]>, [REDACTED]
([REDACTED]) <[REDACTED]>
[REDACTED] Ann
Lundberg <[REDACTED]>

Subject: RE: [EXTERNAL] RE: questionnaires

Date: Sun, 07 Nov 2021 21:49:12 +0000

Attachments: 2021-11-08_joint_letter_regarding_juror_questionnaires.pdf

[REDACTED]

Attached is a draft of a joint letter. Please let us know if you have any edits – we'll check for accuracy on our end as well, but we wanted to circulate so that we could all check at the same time. Please note that, for three jurors, we've withdrawn our objection and joined your position that those jurors should proceed to voir dire. Those juror numbers are: 127, 151, and 458.

Thanks,

From: [REDACTED] Menninger <[REDACTED]>
Sent: Sunday, November 7, 2021 3:03 PM
To: [REDACTED]
Cc: [REDACTED] Jeff Pagliuca <[REDACTED]>
[REDACTED]
[REDACTED] Ann Lundberg <[REDACTED]>
Subject: RE: [EXTERNAL] RE: questionnaires

Sorry [REDACTED] but we did not use Excel to prepare our list, so I don't know how to convert it. There may be a way to convert the pdf to Excel.

From: [REDACTED]
Sent: Sunday, November 7, 2021 11:54 AM
To: [REDACTED] Menninger <[REDACTED]>
Cc: [REDACTED] Jeff Pagliuca <[REDACTED]>
[REDACTED]
[REDACTED] Ann Lundberg <[REDACTED]>
Subject: RE: [EXTERNAL] RE: questionnaires

With apologies for the delay (we ran into an excel glitch), I'm attaching our current list of proposed strikes. Could you please send us your list in excel? It makes merging the two lists faster. Thanks!

From: [REDACTED] Menninger <[REDACTED]>
Sent: Sunday, November 7, 2021 1:03 PM
To: [REDACTED] <[REDACTED]>
[REDACTED] Jeff Pagliuca <[REDACTED]>
([REDACTED])

Ann Lundberg

Subject: RE: [EXTERNAL] RE: questionnaires

Please find attached Defendant's position on jurors 1-566.

As I understand it, you will be putting ours into the categories described by the Court (joint keeps, joint strikes, gov't only strikes and defense only strikes) and then re-circulating so that we can both check to ensure ours are entered correctly.

Let me know if you have any questions.

Thanks,

From:

Sent: Sunday, November 7, 2021 10:57 AM

To: Menninger

Cc: Jeff Pagliuca

Subject: Re: [EXTERNAL] RE: questionnaires

Thanks very much, sounds good, just let us know when you're ready.

On Nov 7, 2021, at 12:11 PM, Menninger wrote:

Thanks, We are finalizing ours as well and should be done shortly.

From:

Sent: Sunday, November 7, 2021 10:08 AM

To: Menninger Jeff Pagliuca

Subject: RE: questionnaires

Hi Chris,

That's fine, we've completed our review and our paralegal is compiling a list to send over, which shouldn't take much longer.

Thanks,

From: Christian Everdell

Sent: Sunday, November 7, 2021 1:06 AM

To: Menninger

; Jeff Pagliuca

Cc: [REDACTED]

Subject: [EXTERNAL] RE: questionnaires

We are still planning to send you our strikes by noon. But we would like to have a simultaneous exchange of strike lists. Please send us your list at noon as well.

Thanks,

Chris

From: Christian Everdell

Sent: Saturday, November 6, 2021 2:30 PM

To: [REDACTED] Menninger

[REDACTED] Jeff Pagliuca [REDACTED]

Cc: [REDACTED]

Subject: RE: questionnaires

That's fine, [REDACTED]. We should be able to get you our strikes by then. Thanks.

From: [REDACTED]

Sent: Saturday, November 6, 2021 12:53 PM

To: [REDACTED] Christian Everdell [REDACTED]; [REDACTED] Menninger

[REDACTED]; Jeff Pagliuca <[REDACTED]>

Subject: questionnaires

All,

Our joint submission is due to the Court tomorrow outlining four categories of juror numbers. We're happy to take on the task of compiling data for our joint submission. To that end, could you please email us your list of strikes by noon tomorrow? Once we receive your list, we will compile that data into a letter outlining the four categories of juror numbers the Court has requested, and we'll send that back to you so that you can double check the accuracy of the chart. We estimate that process will take a fair amount of time, which is why we'll need your data by noon tomorrow if you'd like us to coordinate the process.

Thanks,

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

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