

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

**Subject:** RE: motions under seal?

**Date:** Fri, 02 Aug 2019 15:26:25 +0000

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[REDACTED],

It is a little difficult to know what needs to be sealed/redacted in the abstract. Out of an abundance of caution, can you file the documents with any reference to evidence/discovery and cooperators redacted? We can then review the unredacted version and discuss what, if anything, can be unredacted for the public version.

[REDACTED] [REDACTED]  
Assistant United States Attorney  
[REDACTED]

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Friday, August 2, 2019 11:03 AM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** motions under seal?

[REDACTED], [REDACTED],

Our motions will be ready to go out in a few hours., One is straight forward legal argument about the cell tower data, which we don't have a problem filing. The other motion deals with the statements to the police and by necessity we discuss the statements in detail. We also discuss some of the discovery and the cooperating witnesses. What is the Government position about filing that motion under seal?

Also, [REDACTED] affidavit hasn't been signed because the only regular access to a notary are members of his legal team and we don't want to witness his signature. We will have him sign it through whatever the process is at MCC or in open court at our next appearance.

[REDACTED]  
[REDACTED]  
[REDACTED]  
Garden City, NY 11530  
[REDACTED]  
[REDACTED]

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