

From: "[REDACTED]" <[REDACTED]>
To: Christian Everdell <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Cc: "Mark S. Cohen" <[REDACTED]>, Jeff Pagliuca <[REDACTED]>, 'Laura Menninger' <[REDACTED]>

Subject: RE: Protective Order

Date: Sat, 25 Jul 2020 20:13:13 +0000

Attachments: 2020-07-25,_GM,_protective_order,_clean_version.docx

Inline-Images: image001.png; image002.jpg

Chris,

Following up on our discussion last night, attached please find a revised draft protective order. As we discussed, although this does not represent a version that has been formally approved internally at our Office, it is an effort to include the updates and edits we talked through yesterday. I believe this should represent what we addressed, but I also realize that we've revised some aspects that you mentioned you'd need to further consider, and there is some new proposed language in areas you suggested we clarify, so I expect it may be useful to chat again once you've reviewed. All that said, we wanted to get you the revised version quickly, and I'm happy to discuss again, including anytime this weekend if that's helpful, to go through any outstanding issues.

thanks,

[REDACTED]

From: Christian Everdell <[REDACTED]>
Sent: Wednesday, July 22, 2020 20:13
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Mark S. Cohen <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; 'Laura Menninger' <[REDACTED]>
Subject: Protective Order

[REDACTED] -

Attached is a revised draft of the defense's proposed Protective Order (including a redline against the government's original draft and a clean version). We did our best to incorporate the points we discussed on our last call on Monday, July 20 and to find points of common ground and agreement. Please let us know by 5pm tomorrow whether the attached draft is acceptable to the Government.

Regards,

Chris

Christian Everdell

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