

From: " [REDACTED])" < [REDACTED] >

To: "████████")<████████>"

Subject: Paul Kane Q&A

Date: Sun, 14 Nov 2021 06:30:33 +0000

Attachments: Kane_Q&A.docx

Hey [REDACTED]

Attached is a draft Paul Kane Q&A. There are a couple questions that may seem weird – basically, since PCS didn't create this record, the questions are aimed at a line of Second Circuit cases holding that "Records maintained but not created by a company may be admissible as business records of that company if witnesses testify that the records are integrated into [the] company's records and relied upon in its day-to-day operations." *United States v. Kuthuru*, 665 F. App'x 34, 39 (2d Cir. 2016).

Let's chat about the other hearsay issue when you have a minute?

Thanks!

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