From: [redacted] <[redacted]>
To: "[redacted])" <[redacted]>, "[redacted])" <[redacted]>, "[redacted] (USANYS)" <[redacted]>
Subject: RE: Daubert motion
Date: Mon, 08 Nov 2021 04:25:54 +0000
Attachments: Motion_to_preclude_Dietz_and_Loftus_v5_-pm.docx

For whatever reason I convinced myself that version control would be easier if I put my comments in comment form instead of in tracked changes, so here are a few nits (mostly catching my own errors). I will have the bandwidth to help finalize tomorrow; will start by proofing and cite-checking the version that goes to the chiefs and then can help incorporate any of their comments/do other revisions/etc.

From: [redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 11:20 PM
To: [redacted]) <[redacted]>; [redacted] (USANYS) <[redacted]>; [redacted]>
Subject: RE: Daubert motion

Here are one or two very small things. This looks great to me, and I defer to you guys on the bigger picture stuff, since you're closer to the facts and the law here. Thanks so much for everyone's excellent work on this—really impressive stuff.

From: [redacted]) <[redacted]>
Sent: Sunday, November 7, 2021 10:04 PM
To: [redacted] (USANYS) <[redacted]>; [redacted]) <[redacted]>
Subject: RE: Daubert motion

Hi all,

Here's a version that incorporates the Loftus section. The plan is to have a draft in the chiefs' inbox when they wake up, so if folks are still up, would love comments as you can.

I'm going to write the Rocchio section now, so that will come later…

Thanks,
[redacted]

From: [redacted])
Sent: Sunday, November 7, 2021 8:00 PM
To: [redacted]) <[redacted]>; [redacted]>; [redacted]) <[redacted]>
Subject: Daubert motion

Hi team,

In the interest of expediency, here is the Daubert motion for your comments. I still need to write my section, and I'm doing some significant revisions to the Loftus section, but the Dietz section is done [redacted] crushed it. That's the bulk of the motion, so feel free to read that over, and I'll send you the rest in a second round later.

Thanks,
[redacted]

[redacted]
Assistant United States Attorney
Southern District of New York
[redacted]
[redacted]
[redacted]
[redacted]