From: "[redacted])" <[redacted]>
To: "[redacted])" <[redacted]>
Subject: RE: Paul Kane Q&A
Date: Mon, 29 Nov 2021 06:06:27 +0000
Attachments: Kane_Q&A_v2.docx

Hey[redacted]

I know you have a million other things going on, but I thought you might want to glance over the Paul Kane Q&A again at some point, since he's going after Besselsen, who's going after Matt.

Thanks!
[redacted]

From: [redacted]) <[redacted]>
Sent: Sunday, November 14, 2021 12:54 PM
To: [redacted]) <[redacted]>
Subject: RE: Paul Kane Q&A

Great—two main comments:

1. A lot of questions about record keeping practices are about present practices, but I would guess things may have been different in 1997, so you'll want to navigate that in your meeting with him and adjust the questions accordingly.
2. The closing questions (after the record is in evidence) ask the witness to read out loud on the open record the identifying information for MV1, so you'll need to adjust those.

From: [redacted]) <[redacted]>
Sent: Sunday, November 14, 2021 1:31 AM
To: [redacted]) <[redacted]>
Subject: Paul Kane Q&A

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!
[redacted]

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