

From: "[REDACTED]" <[REDACTED]>
To: Laura Menninger <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, Jeff Pagliuca <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" (USANYS) <[REDACTED]>

Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Date: Wed, 13 Oct 2021 01:35:59 +0000

Attachments: 2021.10.12_Joint_proposed_Maxwell_Trial_Length_Letter_-_v3.pdf

Thanks, Laura. This works for us – we’ve just added a couple sentences noting our production yesterday to our section. I’ll plan to file this at 10.

Thanks,
[REDACTED]

From: Laura Menninger <[REDACTED]>
Sent: Tuesday, October 12, 2021 7:58 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi [REDACTED] –

Thanks. Here is our position for the joint letter. I’ll leave to your discretion whether you want to keep the final paragraph of your position given it is redundant of the joint position. Also, I’m not clear why our report to you would be spelled out in your position rather than ours, so I moved it.

Thanks –
Laura

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, October 12, 2021 5:46 PM
To: Laura Menninger <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi Laura,

That works for us. Attached is a revised letter with our position and space for the defense position.

Thanks,
[REDACTED]

From: Laura Menninger <[REDACTED]>
Sent: Tuesday, October 12, 2021 7:09 PM

To: [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi [REDACTED] –

I do think the Court should understand why we cannot provide a better estimate, in part because our client has been unable to view the exhibit and witness lists. If you want to break up the letter into Government's position and Defendant's position, we could do that. I think the Court will not be pleased with two different letters on the same topic.

Thanks,
Laura

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, October 12, 2021 4:52 PM

To: Laura Menninger <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi Laura,

We don't understand the additions to this letter, which appear to be about the mechanics of yesterday's production. If you would like to file a separate letter about that, you're of course free to do so, but the Court has ordered us to provide a joint letter estimating the trial length.

To the extent you'd like us to let the Court know that you are not able to provide an estimate until closer to trial or until you've had more opportunity to review the materials produced yesterday, we can include language along those lines. But we're not able to agree to a joint letter with language complaining about the drive delivery, which is not responsive to the Court's order.

Please let us know whether you would agree to language along those lines or whether we should file separate letters.

Thanks,
[REDACTED]

From: Laura Menninger <[REDACTED]>

Sent: Tuesday, October 12, 2021 5:46 PM

To: [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi [REDACTED] –

We have not yet received it but will take you at your word that it should be delivered today. I've edited our portion of the letter accordingly.

Thanks,

Laura

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, October 12, 2021 2:49 PM
To: Laura Menninger <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi Laura,

Yes, the tracking number is 774871155483. FedEx says it should arrive by the end of the day.

Thanks,
[REDACTED]

From: Laura Menninger <[REDACTED]>
Sent: Tuesday, October 12, 2021 4:02 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

We have not yet received the drive. Do you have the tracking number? I understand that Chris and Bobbi received theirs by picking it up in person.

-Laura

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, October 12, 2021 1:54 PM
To: Laura Menninger <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi Laura,

Yes, we sent out the drive last night using the overnight pre-paid FedEx label you gave us, addressed to Ann. Our understanding is that Bobbi and Chris also already have their drives.

Thanks,
[REDACTED]

From: Laura Menninger <[REDACTED]>
Sent: Tuesday, October 12, 2021 3:34 PM
To: [REDACTED] <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

EFTA00067107

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Christian Everdell <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>

Subject: Re: [EXTERNAL] Proposed Jury Questionnaires

[REDACTED]
Joint Proposed Jury Questionnaire and Voir Dire Questions attached.
Regards-
Bobbi

Please note my new office address and preferred email address:

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
[REDACTED]
New York, NY 10007

Main: [REDACTED]
Cell: [REDACTED]
Fax: [REDACTED]
[REDACTED]

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On Oct 9, 2021, at 5:15 PM, BOBBI C STERNHEIM <[REDACTED]> wrote:

[REDACTED]
The combined questionnaire and voir dire questions are being finalized and will be emailed shortly.
Bobbi

Please note my new office address and preferred email address:

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim
[REDACTED]
New York, NY 10007

Main: [REDACTED]
Cell: [REDACTED]

Fax: [REDACTED]
[REDACTED]

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On Oct 9, 2021, at 4:32 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Bobbi,

We are following up on the redlines of the drafts of the questionnaire and voir dire we sent you. Thanks very much for putting those together. Can you let us know whether you will be sending that to us tonight? If not, we think it makes sense for you to seek an extension from the Court so that the parties can continue discussing this and making good faith efforts to narrow the scope of any disagreements.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Friday, October 8, 2021 12:14 PM
To: BOBBI C STERNHEIM <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Christian Everdell <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>
Subject: RE: [EXTERNAL] Proposed Jury Questionnaires

Hi Bobbi,

Thanks for sending this. We can't follow the melding of these documents. Could you please send us a redline of the draft we sent you, and add any additional materials in track? Reviewing two documents without track changes is unworkable.

Thanks,

[REDACTED]

From: BOBBI C STERNHEIM <[REDACTED]>
Sent: Friday, October 8, 2021 11:09 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Christian Everdell <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>
Subject: [EXTERNAL] Proposed Jury Questionnaires

Good morning-

The melding of our respective questionnaires has posed difficulties.

For purposes of today's conferral, attached is your version of the questionnaire with slight edits in track change.

Also attached is draft of our (far more robust) proposed questionnaire in Word (formatting to be corrected.)

Our proposed questionnaire incorporates portions of your proposed voir dire, which would be redundant if covered by a written questionnaire.

We are working on a more inclusive version of proposed voir dire questions for this afternoon's conferral.

Bobbi

Please note my new office address and preferred email address:

BOBBI C. STERNHEIM, ESQ.
Law Offices of Bobbi C. Sternheim

████████████████████
New York, NY 10007

Main: ██████████

Cell: ██████████

Fax: ██████████
████████████████████

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