

From: Brian Burns <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, Jeff Pagliuca
Cc: "ceverdel" <[REDACTED]>, Patrick Smith <[REDACTED]>
"bcsternheim" <[REDACTED]>, Laura Menninger <[REDACTED]>
<[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: [EXTERNAL] RE: Subpoena for [REDACTED]
Date: Sat, 20 Nov 2021 19:44:11 +0000
Attachments: 2021.11.15 - 1 - Letter from Patrick J. Smith to Judge Nathan.pdf
Inline-Images: image001.gif; image002.jpg

Counsel – We are required to file our Nov. 15 letter to Judge Nathan on the public docket by tomorrow (copy attached for reference). We do not intend to apply any redactions. I assume that neither the government nor the defense proposes any redactions to this letter, but I'd appreciate confirmation before we file.

Thanks,

Brian T. Burns
Smith Villazor LLP

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, November 17, 2021 9:27 PM
To: Jeff Pagliuca <[REDACTED]>, Brian Burns <[REDACTED]>
Cc: ceverdel <[REDACTED]>, Patrick Smith <[REDACTED]>; Laura Menninger <[REDACTED]>
bcsternheim <[REDACTED]> <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
<[REDACTED]> <[REDACTED]> (USANYS) <[REDACTED]>
Subject: [EXTERNAL EMAIL] RE: Subpoena for Jordana Feldman

Thanks, Jeff.

Brian, in light of Jeff's email, attached is the unredacted defense motion.

Thanks,
[REDACTED]

From: Jeff Pagliuca <[REDACTED]>
Sent: Wednesday, November 17, 2021 9:07 PM
To: Brian Burns <[REDACTED]>
Cc: ceverdel <[REDACTED]>, Patrick Smith <[REDACTED]>; Laura Menninger <[REDACTED]>
bcsternheim <[REDACTED]> <[REDACTED]> <[REDACTED]>; [REDACTED] <[REDACTED]> <[REDACTED]>
<[REDACTED]> <[REDACTED]> (USANYS) <[REDACTED]> <[REDACTED]> <[REDACTED]>
<[REDACTED]>
Subject: [EXTERNAL] Re: Subpoena for [REDACTED]

Brian, I believe that we were waiting for any proposed redactions from the government. We have no problem with the government sending you a copy of the motion. If the government does not object, we will send it. However, the government has designated every production confidential, subject to its protective order, and the motion contains information designated as confidential. Accordingly, we will defer to it as to what you should receive.

Best Regards,

Jeffrey S. Pagliuca.

On Nov 17, 2021, at 7:58 PM, Brian Burns <[REDACTED]> wrote:

Defense counsel – Would you please provide us a copy of your motion seeking the issuance of this subpoena? We haven't seen a copy. Thank you.

Brian T. Burns

Smith Villazor LLP

[REDACTED]

From: Christian Everdell <[REDACTED]>
Sent: Tuesday, November 16, 2021 8:48 PM
To: Patrick Smith <[REDACTED]>; Brian Burns <[REDACTED]>
Cc: Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; BOBBI C STERNHEIM <[REDACTED]>
<[REDACTED]>; <[REDACTED]> (USANYS) <[REDACTED]>; <[REDACTED]>
<[REDACTED]>
Subject: [EXTERNAL EMAIL] Subpoena for [REDACTED]

Counsel –

Attached please find the signed subpoena for [REDACTED]. Please acknowledge receipt.

Regards,

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
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