

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: Noel Status
Date: Tue, 27 Apr 2021 02:48:34 +0000

Great. Thanks, [REDACTED].

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, April 26, 2021 10:48 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: Noel Status

Sounds fine to me and I think there is a good chance that by Friday we will have formally begun discussions with defense counsel, which you could note in the *ex parte* submission.

Sent from my iPhone

On Apr 26, 2021, at 8:35 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Hi [REDACTED],

Thanks for the call earlier today. I checked in with [REDACTED], and we think the best course here, instead of formally seeking an extension on Wednesday, is to submit a schedule to the Court on Friday (per the Court's current order) that says we'll submit everything for *in camera* review by May 14 (which we said we would do anyway if the DP doesn't happen), but explain where things stand more specifically in an *ex parte* submission to the Court on the same day, flagging that we may seek a new schedule soon if *Noel* resolves. I'll check in with the Times on Wednesday to get their sign off without telling them anything substantive (if they have a very adverse reaction we can go back to seeking a formal extension on Wednesday, but we think they'll stay calm), and then we can let PAE know where things stand on the DP on Friday instead of Wednesday.

Let me know if you have any concerns or would like to discuss. Otherwise, I'll check in on Wednesday to see where things stand.

Thanks,
[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, April 26, 2021 2:26 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Noel Status

Give me a ring.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, April 26, 2021 1:16 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Noel Status

Hi all,

Sorry to bug on this, but I think we'll need to provide an update and/or seek more time from the Court by Wednesday at latest in the Epstein FOIA if we do not think there will be a determination on the *Noel* DP today or tomorrow, and I'll have to check in with the Times in some form before we do that. Is it possible to provide any sense of the timing, or an update on where things stand in *Noel*?

Thanks,

[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, April 22, 2021 10:44 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Noel Status

Probably – but I will have a better sense tomorrow and will get back you you.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, April 22, 2021 10:36 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Noel Status

Hi all,

Would it be possible to provide an update on the status of the deferred prosecution agreements in *Noel*? Do we anticipate having a determination on those in the next few days? We may need to update the Court and/or check in with the Times about timing in the Epstein FOIA depending on where things stand on the DP front.

Thanks,

[REDACTED]

Assistant United States Attorney
300 Quarropas Street
White Plains, NY 10601
Telephone: [REDACTED]