

From: Christian Everdell <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, bcsternheim_mac.com <[REDACTED]>, Jeff Pagliuca <[REDACTED]>, Laura Menninger <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" (USANYS) <[REDACTED]>

Subject: [EXTERNAL] RE: Redactions to MILs

Date: Thu, 04 Nov 2021 05:31:16 +0000

Attachments: 002_Motion_to_Exclude_Evidence_Prnt_to_Rule_404(b)_Proposed_Redactions_Revised.pdf;
002a_Ex_A_to_Motion_to_Exclude_Evidence_Prnt_to_Rule_404(b)_Proposed_Redactions_Revised.pdf; 004_Motion_to_Exclude_Accuser-3_Evidence_Proposed_Redactions_Revised.pdf;
013_Motion_to_Preclude_Introduction_of_Government_Exhibits_251_288_294_313_and_606_Proposed_Redactions_Revised.pdf;
Govt_Omnibus_Opp_[Proposed_Redactions]_Revised.pdf;
Maxwell_Reply_ISO_Motns_In_Limine_Proposed_Redactions_Revised.pdf

[REDACTED]

Attached are our revised redactions (highlighted in yellow). We also request that the following exhibits be filed under seal:

1. Exhibits A and B to Defense MIL #4
2. Exhibit 1 to Defense MIL #7
3. Exhibit A to Defense MIL #13

We don't need to see your version before you file.

Thanks,

Chris

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, November 2, 2021 12:44 PM
To: Christian Everdell <[REDACTED]>; bcsternheim_mac.com <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Redactions to MILs

Counsel,

We're preparing a new version of the proposed redactions to the MILs that withdraw some of our proposals. Please let us know which if any of your proposed redactions you would like to withdraw, and whether you would like to see our version before we send it to the Court. In particular, please let us know by Thursday at 10 a.m. so we have some time before this is due to the Court.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York
1 Saint Andrews Plaza
New York, New York 10007

[REDACTED]

[REDACTED]