From: ██████████████████████

██████████████████████████████████████

██████████████████████

Cc: "██████████████)" <███████████████>, "████████████████)"

<██████████████████>, "████████████ (██████████████████>

Subject: RE: Severance opp

Date: Mon, 22 Feb 2021 01:37:42 +0000

Attachments: Severance_draft_v7████████docx

Thanks, ███████. Well done. Some comments and questions in track.

My primary concern is that we may be slightly over-relying on *Pomatis* and wonder if it is worth doing a bit more with *Ruiz* and/or *Broccolo* instead? In particular, as I understand it, in *Pomatis*, the perjury charges stemmed from the defendant lying to the FBI and then the grand jury about the robbery he was then charged with, and presumably shortly after (or at least not 20 years after) the crime. I do think that is a little different – and the argument for joinder a littler stronger – than our facts, which we may want to acknowledge. That said, I would encourage you to use her own arguments in support of the suppression motions against her – i.e., she herself argues that the risk of criminal prosecution was on her mind at the time of the depositions…

From: █████████████████████>

Sent: Sunday, February 21, 2021 5:43 PM

To: ███████████████████████████

████████████████████████████████████

(██████████████████>

Subject: Severance opp

Hi ████████████,

Attached for your review is a draft of the opposition to Maxwell's motion to sever the perjury counts, along with a copy of that motion.

Thanks,

████████

████████████

Assistant United States Attorney

Southern District of New York

1 Saint Andrews Plaza

New York, New York 10007

████████████

████████████