

**From:** [REDACTED]

**To:** [REDACTED]

**Subject:** RE: 412 letter

**Date:** Fri, 15 Oct 2021 00:58:39 +0000

**Attachments:** 2021-10-15\_Gov't\_letter\_re\_FRE\_412\_v1 [REDACTED].docx

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Draft back to you. I'm reading *Smith* now.

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**From:** [REDACTED]

**Sent:** Thursday, October 14, 2021 7:14 PM

**To:** [REDACTED]

**Subject:** 412 letter

[REDACTED]

Very rough draft attached, saved on shared. Take a look at the Smith case/let me know if you find other caselaw? Feel free to edit freely. I'll be back online in a bit but wanted to send something your way.

Thanks,

[REDACTED]

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Southern District of New York  
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New York, New York 10007  
Tel: [REDACTED]