

Also, do you have any objection if we edit the places where your redline uses victim names to the "Minor Victim-X" terminology? Our understanding is that we have to file this on ECF, and we just want to avoid having to redact anything.

Thanks,

From: Christian Everdell <[REDACTED]>
Sent: Tuesday, November 2, 2021 3:43 PM
To: [REDACTED] <[REDACTED]>
Subject: [EXTERNAL] Re: Redactions to MILs

[REDACTED] —
Do you have a minute for a quick call about the jury instructions? Should take 5-10 mins.

Thanks,

Chris

Sent from my iPhone

On Nov 2, 2021, at 12:44 PM, [REDACTED] <[REDACTED]> wrote:

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