

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re: Conferral Regarding Possible Violation of Local Criminal Rule 23.1
Date: Fri, 07 May 2021 21:58:39 +0000

Ok, [REDACTED] can you start the tree in a bit when you're ready?

On May 7, 2021, at 5:53 PM, [REDACTED] <[REDACTED]> wrote:

Agree. I'm free this evening and tomorrow.

From: [REDACTED] <[REDACTED]>
Sent: Friday, May 7, 2021 5:32 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Conferral Regarding Possible Violation of Local Criminal Rule 23.1

Makes sense to me. I'm free starting at 6:15 or 6:30, or pretty much anytime tomorrow.

On May 7, 2021, at 5:25 PM, [REDACTED] <[REDACTED]> wrote:

The short answer is no, he does not, but let's discuss next time we talk. I'm around probably until 7 this evening if the team wants to talk about pending issues before then. I think we need to discuss: 1) this email, 2) the MDC letter, and 3) the letter due Monday. I think we should also schedule a time to talk on Monday about the motions they're filing tonight.

From: Laura Menninger <[REDACTED]>
Sent: Friday, May 7, 2021 5:18 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Jeff Pagliuca [REDACTED]; 'Bobbi Sternheim' [REDACTED]
Subject: Conferral Regarding Possible Violation of Local Criminal Rule 23.1

Counsel –

The linked article by the Sun dated yesterday contains a number of statements which, if made by a lawyer associated with a witness in this case, appear to violate Local Criminal Rule 23.1. *See also* Dkt. No. 28 (expectation of strict compliance with Rule 23.1 by "counsel for all involved parties"). The rule applies by its terms to any "lawyer participating in or associated with the investigation (including ... lawyers for targets, subjects, and witnesses in the investigation...)."

<https://www.thesun.co.uk/news/14875477/ghislaine-maxwell-plea-deal-same-fate-as-epstein/>

I am writing to confer with you prior to bringing this to the Court's attention. Please let me know if you believe Mr. Spencer Kivin represents any witness in this case.

Given the urgency of this situation, I would appreciate a response by close of business Monday.

Thanks,
Laura

Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203

<image001.jpg>



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