

**From:** "[REDACTED]" >

**To:** "[REDACTED]" >

**Cc:** "[REDACTED]" >

**Subject:** Two updates

**Date:** Thu, 17 Sep 2020 15:23:32 +0000

**Attachments:** 20cr330\_SEALED\_Memo\_Endorsement\_9.17.20.pdf

---

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED].

Second, the Maxwell team submitted an ex parte Rule 16(d) application to Judge Nathan seeking permission to delay production of photographs of victims not part of the Indictment. AJN ordered us to show cause why the submission should be ex parte and under seal, which we did by letter yesterday. Today, she rejected our request to proceed ex parte, but is allowing us to withdraw the application so we can draft/file a new one on notice.