

From: [REDACTED] <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: motions under seal?

Date: Fri, 02 Aug 2019 15:03:01 +0000

[REDACTED], [REDACTED],

Our motions will be ready to go out in a few hours., One is straight forward legal argument about the cell tower data, which we don't have a problem filing. The other motion deals with the statements to the police and by necessity we discuss the statements in detail. We also discuss some of the discovery and the cooperating witnesses. What is the Government position about filing that motion under seal?

Also, [REDACTED] affidavit hasn't been signed because the only regular access to a notary are members of his legal team and we don't want to witness his signature. We will have him sign it through whatever the process is at MCC or in open court at our next appearance.

[REDACTED]
[REDACTED]
[REDACTED]
Garden City, NY 11530
[REDACTED] [P] [REDACTED] [F]
[REDACTED]

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