

From: "[REDACTED] (USAFLS)" <[REDACTED]>

To: "[REDACTED]. (USAFLS)" <[REDACTED]>

Subject: Re: Jane Does [REDACTED] United States - Redacted Pleadings

Date: Wed, 03 Jul 2013 15:39:57 +0000

Importance: Normal

I was waiting for the order to make the change on the motion to dismiss. Thanks.

On Jul 3, 2013, at 11:13 AM, "[REDACTED]. (USAFLS)" <[REDACTED]> wrote:

Hi [REDACTED] – I just read the Motion to Dismiss for lack of subject matter jurisdiction. It looks good except that the attached Judge Middlebrooks Order has more redactions than the one that I gave to Judge Middlebrooks yesterday. You just need to change that to correspond with what we gave him.

I will keep reading and also look for the motions to seal. I think I have them all.

[REDACTED]
Assistant U.S. Attorney
Southern District of Florida

From: [REDACTED] (USAFLS)
Sent: Wednesday, July 03, 2013 10:30 AM
To: [REDACTED]. (USAFLS); [REDACTED] (USAFLS)
Subject: Jane Does [REDACTED] United States - Redacted Pleadings

Attached are the redacted motion to dismiss, motion to stay discovery (with attached unredacted RFP), and reply in support of motion to dismiss (plus exhibits). Other than the motions to seal, and the redacted version of Judge Middlebrooks' order (which accompanied all of our filings and which is also attached), I believe that these are the only documents that we are required to file in redacted form. Does anyone disagree?

Please take a look and let me know if you think we need to redact any additional language. Given Judge Marra's rulings, what he has already publicly disclosed, and what we are requested from Judge Middlebrooks, it has been a light redaction. I have mostly redacted language that in some way identifies the grand jury as the source of our representations about SDNY and DNJ or that identifies the victims by their initials. Feel free to tell me if you think my approach presents any problem.

Does anyone have Word or WordPerfect versions of the motions to seal?