

**From:** [REDACTED]  
**To:** "Martin G. Weinberg" <[REDACTED]>  
**Cc:** [REDACTED], "'Miller, Michael'" <[REDACTED]>, 'Reid Weingarten' <[REDACTED]>

**Subject:** RE: Protective Order

**Date:** Wed, 24 Jul 2019 21:58:36 +0000

**Attachments:** 2019-07-24,\_JE,\_protective\_order\_for\_discovery\_(RMB).pdf

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Marty,

Attached is a revised protective order, which incorporates the edits from our discussion today. If there are any issues or questions, please let us know. Otherwise, if you could please send us a signed copy, we'll take care of submitting it to the Court.

Thanks,

[REDACTED]

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**From:** Martin G. Weinberg <[REDACTED]>  
**Sent:** Wednesday, July 24, 2019 10:51 AM  
**To:** [REDACTED]; 'Martin Weinberg' <[REDACTED]>  
**Cc:** [REDACTED]; 'Miller, Michael' <[REDACTED]>; 'Reid Weingarten' <[REDACTED]>  
**Subject:** RE: Protective Order

Hi [REDACTED]

Some points for discussion or consideration re draft Protective Order:

Pg 2, line 2 - we consent to the entry of the Order but not necessarily all of the averments made by the Government in support of the Order

Pg 3 - par 2 - we need to distinguish between providing discovery electronically to others on the defense team (encrypt or password protected) and providing hard copies of discovery for the purpose of review by counsel or by counsel or others on defense team with the defendant at MCC

Pg 3 - par 3 -5 - these obligations should extend to Govt as well as defense

Pg 3 - par 4 - are you precluding public discussion of identity of witnesses already known to the defense i.e. known independent of the discovery

Pg 3/4 - par 5 - are you asking for redacted public filings or the entire filing being filed under seal - we could redact any quoting of the discovery or attaching of the discovery if that suffices

Pg 4-5 par 7 - there is no need for allegations of potential obstruction or harm to witnesses in this case - I would request that such language be redacted as unnecessary if we are not contesting the clause. Please advise if the Govt intends to mark all 302s as "confidential" or just the identifying info (names, addresses, etc).

Par 12 - defense should be allowed to retain discovery through the filing date of a 2255

Reid, Mike may have additional questions, points.

Available after 1 to discuss.

Thanks

Marty

Martin G. Weinberg, Esq.  
[REDACTED]

EFTA00028423

Boston, MA 02116

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, July 23, 2019 7:02 PM  
**To:** Martin G. Weinberg <[REDACTED]>  
**Cc:** [REDACTED]  
**Subject:** Protective Order

Marty,

Following up on our conversation this morning, I'm attaching the proposed protective order we discussed. If you have any questions, or think it would be productive to schedule a call to discuss, please let us know.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney  
Southern District of New York  
One Saint Andrew's Plaza  
New York, NY 10007

[REDACTED]

EFTA00028424