

From: "[REDACTED]" >
To: "[REDACTED]" >
Cc: "[REDACTED]" >, "[REDACTED]" >
[REDACTED] >

Subject: RE: motions

Date: Thu, 20 May 2021 00:05:11 +0000

Attachments: Government_Opposition_to_Defense_Supplemental_Pretrial_Motions_v2.docx

Full doc attached, thanks! I added three sentences into the intro paragraph to summarize my sections.

From: [REDACTED] >
Sent: Wednesday, May 19, 2021 7:56 PM
To: [REDACTED] >
Cc: [REDACTED] >; [REDACTED] >
Subject: Re: motions

Does anyone want to review the full doc once [REDACTED] circulates? I can fill out the intro paragraph, add in the docket cite to my section, and then send to the chiefs.

On May 19, 2021, at 7:40 PM, [REDACTED] > wrote:

Sorry, just realized you already sent me the master doc. Will incorporate now and send the full version around shortly.

From: [REDACTED])
Sent: Wednesday, May 19, 2021 7:39 PM
To: [REDACTED] >; [REDACTED] >; [REDACTED] >
[REDACTED] >
Subject: RE: motions

Attached are my sections. Thanks very much for your patience with me on this, team. Between the move and getting sick, I've had trouble keeping on top of things over the past week. Happy to incorporate this into the master doc if you want to send it to me.

From: [REDACTED] >
Sent: Wednesday, May 19, 2021 5:28 PM
To: [REDACTED] >; [REDACTED] >; [REDACTED] >
[REDACTED] >
Subject: RE: motions

Yes, good idea - I will add that in when I get the doc back from [REDACTED]. Thanks, all!

From: [REDACTED] >
Sent: Wednesday, May 19, 2021 5:22 PM
To: [REDACTED] >; [REDACTED] >; [REDACTED] >
[REDACTED] >
Subject: RE: motions

Updated version attached – I've accepted all edits and added no new edits (nice work, team). Just one question for [REDACTED]:

[REDACTED], this goes to you next. If you can add your points when you edit, that would be great. Thanks.

From: [REDACTED] >

Sent: Wednesday, May 19, 2021 3:45 PM

To: [REDACTED] >; [REDACTED] >; [REDACTED] >

Subject: RE: motions

Here is a current draft of the opposition. I wanted to circulate this so others could start editing/reviewing the other sections. My suggestions/nits are in track changes.

From: [REDACTED] >

Sent: Wednesday, May 19, 2021 11:49 AM

To: [REDACTED] >; [REDACTED] >; [REDACTED] >

Subject: motions

Team,

Checking in on the status for the motions. I'm attaching the NPA point draft, which can be folded in. Can folks let me know the status of pending motion points, for planning purposes? I think our deadline to get this to the chiefs is EOD today, so ideally we'd combine this by this afternoon and circulate quickly around the team for edits.

Thanks all—

[REDACTED]

[REDACTED]

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