

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

Subject: RE: Rule 23 motion

Date: Wed, 22 Jul 2020 22:21:29 +0000

Attachments: 2020-07-22,_GM,_letter_to_Judge_Nathan_re_Local_Rule_23.1_v2.docx

Very sorry for the delay—I've lost count of how many times I've had to restart my computer today. Attached is the draft in its current form.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, July 22, 2020 6:18 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Rule 23 motion

Okay, thanks. On the draft, if someone could just send me whatever you have at whatever stage it is now, I'll take it from here as I really want to get this up to the Brass tonight. Thanks

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, July 22, 2020 5:59 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Rule 23 motion

Perfect, and I did – I mentioned we'd be filing a response in the next day or so.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, July 22, 2020 17:57
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: Re: Rule 23 motion

I think no position is right, although I think you can tell him we plan to file something in response soon. Speaking of, what is the status of the draft?

Sent from my iPhone

On Jul 22, 2020, at 3:58 PM, [REDACTED] <[REDACTED]> wrote:

Just FYI for everyone, Brad just called and asked if we had a view as to whether victims' counsel should file a response to the defense motion from last night. I said my assumption was that we had no position or view at all with respect to

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what victims' counsel should or should not do, and wouldn't direct victim counsel on something like that, but that I would let him know if that was incorrect. So please let me know if we should convey something else, and I'm happy to pass it along, otherwise I've conveyed our neutrality.

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]