

From: Christian Everdell <[REDACTED]>

To: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: [EXTERNAL] RE: Draft joint proposed request to charge

Date: Mon, 25 Oct 2021 22:58:41 +0000

Attachments: 2021.10.25_Letter_to_Judge_Nathan_re_Extension_of_Time.DOCX

[REDACTED] –

Attached is the letter we intend to file with the Court regarding the extension to file the jury charge. It should reflect everything we discussed on our call earlier today.

Please let me know if you have any issues with it as soon as you can. I'd like to file it in the next hour or so.

Thanks,

Chris

From: [REDACTED] >

Sent: Monday, October 25, 2021 2:29 PM

To: Christian Everdell <[REDACTED]>; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>

Cc: [REDACTED]

Subject: RE: Draft joint proposed request to charge

Hi Chris,

That works. I'm around this afternoon – give me a call at [REDACTED] whenever you have a minute.

Thanks,

[REDACTED]

From: Christian Everdell <[REDACTED]>

Sent: Monday, October 25, 2021 1:56 PM

To: [REDACTED] >; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>

Cc: [REDACTED]

Subject: [EXTERNAL] RE: Draft joint proposed request to charge

[REDACTED] –

I think I have a way to come to an agreement on this. I know today is extremely busy for all of us, but can you and I have a 5 min. call to discuss? I don't think everyone from SDNY needs to be on this call, but I leave that to you.

Thanks,

Chris

From: [REDACTED] >
Sent: Sunday, October 24, 2021 3:10 PM
To: Christian Everdell <[REDACTED]>; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Cc: [REDACTED]
Subject: RE: Draft joint proposed request to charge

Hi Chris,

I think the answer is yes, but just to make sure: we'd file the Government's proposal on Wednesday, you'd file whatever redline you like on November 3. It also occurs to us that, since your redline will presumably contain new proposals/objections to ours and would not include our views, we'd want to file a short reply on November 5 or 8.

We'd consent to that option and, if you like, would join your motion for that schedule.

Thanks,
[REDACTED]

From: Christian Everdell <[REDACTED]>
Sent: Sunday, October 24, 2021 12:35 PM
To: [REDACTED] >; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: [EXTERNAL] RE: Draft joint proposed request to charge

Hi [REDACTED] –

I just want to clarify the redline option. If we did the redline option, would you file the government's RTC (without defense comment) on Oct. 27 and then we would file the joint RTC (i.e., our redline of your RTCs) on Nov. 3? And you would consent to that option?

Thanks,

Chris

From: [REDACTED] >
Sent: Friday, October 22, 2021 2:30 PM
To: Christian Everdell <[REDACTED]>; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Cc: [REDACTED]
Subject: RE: Draft joint proposed request to charge

Hi Chris,

We had another idea that might facilitate things. We know Judge Nathan asked for a joint RTC, but what about asking Judge Nathan to let us file separate ones? We would also be comfortable setting a deadline for the defense RTC (or a defense redline of ours) on November 3.

If you were to make a request to file separate RTCs, with your deadline on November 3, we would join that request.

Thanks,
[REDACTED]

From: Christian Everdell <[REDACTED]>

Sent: Wednesday, October 20, 2021 4:07 PM

To: [REDACTED]; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>

Cc: [REDACTED]

Subject: [EXTERNAL] RE: Draft joint proposed request to charge

Hi [REDACTED] –

Given all of the other things we have going on this week, the defense would like a little more time to submit the joint requests to charge. We plan to ask the Court for an extension until Monday, Nov. 1. Does the government consent to that request?

Thanks,

Chris

From: [REDACTED]

Sent: Wednesday, October 20, 2021 12:30 PM

To: Christian Everdell <[REDACTED]>; BOBBI C STERNHEIM <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>

Cc: [REDACTED]

Subject: Draft joint proposed request to charge

Counsel,

Attached please find a draft joint proposed request to charge. Since this is due to the Court on Wednesday, October 27, please send us your comments by Sunday, October 24. Please also send us your comments, including any additional proposed jury instructions, as a redline to this document.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]