

From: "████████")<████████>
To: Christian Everdell <████████>, "████████ (USANYS)" <████████>, "████████")<████████>
Cc: Jeff Pagliuca <████████>, Laura Menninger <████████>, 'BOBBI C STERNHEIM' <████████>
Subject: RE: Pseudonyms

Date: Wed, 10 Nov 2021 01:33:57 +0000

Attachments: 2021-11-10,_letter_re_pseudonyms_and_sealing.pdf; Exhibit_A.pdf

Inline-Images: image001.gif; image003.jpg

All,

Attached is a draft of the letter regarding the logistics relating to pseudonyms. There is a section for your position, so if you could please send us the language you'd like us to add by tomorrow evening, we can finalize and file it.

Thanks,

████████

From: Christian Everdell <████████>
Sent: Tuesday, November 9, 2021 11:23 AM
To: █████<████████>; █████<████████>; █████
(USANYS) <████████>; █████<████████>
Cc: Jeff Pagliuca <████████>; Laura Menninger <████████>; 'BOBBI C STERNHEIM'
<████████>
Subject: [EXTERNAL] RE: Pseudonyms

Yes, let's do that. I'll put them to the attention of █████

From: █████<████████>
Sent: Tuesday, November 9, 2021 11:16 AM
To: Christian Everdell <████████>; █████<████████>; █████
████████ (USANYS) <████████>; █████<████████>
Cc: Jeff Pagliuca <████████>; Laura Menninger <████████>; 'BOBBI C STERNHEIM'
<████████>
Subject: RE: Pseudonyms

Thanks, Chris. Since I'm not sure exactly where we'll be in the morning, and I don't want to delay you at all in the morning, it make sense to just drop them at the security tent at our office, which is next door. Would that work?

From: Christian Everdell <████████>
Sent: Tuesday, November 9, 2021 10:52 AM
To: █████<████████>; █████<████████>; █████
(USANYS) <████████>; █████<████████>
Cc: Jeff Pagliuca <████████>; Laura Menninger <████████>; 'BOBBI C STERNHEIM'
<████████>
Subject: [EXTERNAL] RE: Pseudonyms

Thanks, [REDACTED] I can try to bring the hard drives to the hearing (we have 4 to give you). I should be able to bring them in, but maybe it's better to have a paralegal meet me in front of the side entrance of 40 Foley at 8:30am. I can hand them off.

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, November 9, 2021 10:42 AM
To: Christian Everdell <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; 'BOBBI C STERNHEIM' <[REDACTED]>
Subject: RE: Pseudonyms

Hi Chris,

Not a problem, we're aiming to send you the letter later today that addresses all of those issues. Separately, could you please bring extra drives to the hearing, along the lines we've discussed? If it's easier to mail them (or if it would be an issue to bring them past security), that's fine too.

Thanks,

From: Christian Everdell <[REDACTED]>
Sent: Tuesday, November 9, 2021 10:40 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; 'BOBBI C STERNHEIM' <[REDACTED]>
Subject: [EXTERNAL] Pseudonyms

[REDACTED], [REDACTED], [REDACTED] and [REDACTED] -

According to my notes, the following three joint letters regarding pseudonyms are due to the court tomorrow:

1. Joint letter (filed under seal) re: pseudonyms used by witnesses
2. Joint letter (filed on ECF) re: limiting instruction re: pseudonyms
3. Joint letter (filed on ECF) re: procedures w/r/t pseudonyms to be used at voir dire and sealing/redacting exhibits at trial

Please send us your proposals by COB today. Jeff and Laura are traveling today for the hearing and we need the chance to discuss your proposals with them tonight when they arrive.

Thanks,

Chris

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
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New York | Paris | Washington DC | London



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