

From: "██████████)" <██████████>
To: "██████████)" <██████████>, "██████████ (USANYS)"
<██████████>, "██████████ (USANYS)" <██████████>
Cc: "██████████ (USANYS)" <██████████>, "██████████
)" <██████████>

Subject: RE: US v. Maxwell - [Request for 120 or 180-day Adjournment of Trial]

Date: Thu, 22 Apr 2021 17:32:25 +0000

Attachments: 2021-04-22_Gov't_letter_re_GM_request_for_adjournment_v3.docx

Draft response attached.

From: █████) <██████████>
Sent: Thursday, April 22, 2021 12:14 PM
To: █████ (USANYS) <██████████>; █████ (USANYS) <██████████>
Cc: █████) <██████████>; █████ (USANYS) <██████████>
Subject: FW: US v. Maxwell - [Request for 120 or 180-day Adjournment of Trial]

FYI. Our response is due at 5 today.

From: Laura Menninger <██████████>
Sent: Thursday, April 22, 2021 11:22 AM
To: █████
Cc: █████) <██████████>; █████) <██████████>; █████
(USANYS) <██████████>; █████) <██████████>; Jeff Pagliuca
<██████████>; █████' <██████████>; 'Bobbi Sternheim
(██████████)' <██████████>; Nicole Simmons <██████████>
Subject: US v. Maxwell - [Request for 120 or 180-day Adjournment of Trial]

Judge Nathan -

Pursuant to this Court's Order of April 20, 2021 (Dkt. 221), attached please find counsel's Letter Motion for an Adjournment of the trial.

Counsel for Ms. Maxwell request redaction of their other clients' names and case numbers from this Letter Motion pursuant to Rule of Professional Conduct 1.6 which prohibits lawyers from revealing confidential information related to a client even where that information is publicly available. *See In Re. Anonymous*, 654 N.E. 2.d. 1128 (Ind. 1995) (lawyer violated Rule 1.6 by disclosing information relating to representation of client, even though information "was readily available from public sources and not confidential in nature"); *In re Bryan*, 61 P.3d 641 (Kan. 2003) (lawyer violated Rule 1.6 by disclosing, in court documents, existence of defamation suit against former client); *State ex rel. Okla. Bar Ass'n v. McGee*, 48 P.3d 787, 791 (Okla. 2002) (a lawyer's duty of confidentiality attaches "to all information relating to the representation, whatever its source").

Upon direction of the Court, counsel will file either the redacted or unredacted version of this letter on the public docket.

Best regards,
Laura Menninger

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
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