

From: "████████")<████████>
To: Jeff Pagliuca <████████>, Brian Burns <████████>
Cc: "ceverdell████████>; Patrick Smith <████████>; Laura Menninger <████████>; "████████")<████████>; "████████")<████████>; "████████")<████████>"
"████████" (USANYS)" <████████>

Subject: RE: Subpoena for ██████████

Date: Thu, 18 Nov 2021 02:27:03 +0000

Attachments: 2021.11.14_Mtn_for_Order_Auth_a_Sub_Pursnt_to_F.R.Crim.P_17(c)
(3)_re.████████pdf; 2021.11.14_Ex._1.pdf

Inline-Images: image001.gif; image002.jpg

Thanks, Jeff.

Brian, in light of Jeff's email, attached is the unredacted defense motion.

Thanks,

From: Jeff Pagliuca ██████████.
Sent: Wednesday, November 17, 2021 9:07 PM
To: Brian Burns <████████>
Cc: ceverdell████████; Patrick Smith <████████>; Laura Menninger <████████>; bcsternheim████████<████████>; "████████")<████████>; "████████")<████████>; "████████")<████████>; "████████")<████████>
Subject: [EXTERNAL] Re: Subpoena for ██████████

Brian, I believe that we were waiting for any proposed redactions from the government. We have no problem with the government sending you a copy of the motion. If the government does not object, we will send it. However, the government has designated every production confidential, subject to its protective order, and the motion contains information designated as confidential. Accordingly, we will defer to it as to what you should receive.

Best Regards,

Jeffrey S. Pagliuca.

On Nov 17, 2021, at 7:58 PM, Brian Burns <████████> wrote:

Defense counsel – Would you please provide us a copy of your motion seeking the issuance of this subpoena? We haven't seen a copy. Thank you.

Brian T. Burns
Smith Villazor LLP
250 West 55th Street, 30th Floor
New York, New York 10019
Office ██████████ Direct ██████████ | Mobile ██████████

From: Christian Everdell [REDACTED]
Sent: Tuesday, November 16, 2021 8:48 PM
To: Patrick Smith [REDACTED] Brian Burns [REDACTED]
Cc: Jeff Pagliuca [REDACTED] Laura Menninger [REDACTED] BOBBI C STERNHEIM [REDACTED]
>; [REDACTED] < [REDACTED] >; [REDACTED])
< [REDACTED] >; [REDACTED] (USANYS) < [REDACTED] >; [REDACTED])
< [REDACTED] >
Subject: [EXTERNAL EMAIL] Subpoena for [REDACTED]

Counsel –

Attached please find the signed subpoena for [REDACTED] Please acknowledge receipt.

Regards,

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
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