

From: "[REDACTED]" <[REDACTED]>

To: Jeff Pagliuca <[REDACTED]>, Brian Burns <[REDACTED]>

Cc: "ceverdell [REDACTED]" <[REDACTED]>, Patrick Smith

<[REDACTED]>, Laura Menninger <[REDACTED]>

"[REDACTED]" <[REDACTED]>

<[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]"

<[REDACTED]> (USANYS)" <[REDACTED]>

Subject: RE: Subpoena for [REDACTED]

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_[REDACTED].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,
[REDACTED]

From: Jeff Pagliuca <[REDACTED]>

Sent: Wednesday, November 17, 2021 9:07 PM

To: Brian Burns <[REDACTED]>

Cc: ceverdell [REDACTED]; Patrick Smith <[REDACTED]>; Laura Menninger

[REDACTED] bcsternheim [REDACTED] <[REDACTED]>; [REDACTED]

[REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]

<[REDACTED]>

Subject: [EXTERNAL] Re: Subpoena for [REDACTED]

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 <[REDACTED]> 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 [REDACTED] Direct [REDACTED] | Mobile [REDACTED]

EFTA00040124

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] (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](#)
www.cohengresser.com

New York | Paris | Washington DC | London



CONFIDENTIALITY NOTICE: The information contained in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed initially by only the individual named above. If the reader of this e-mail is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by telephone and permanently delete this e-mail. Thank you.

PRIVACY: A complete copy of our privacy policy can be viewed at: <https://www.cohengresser.com/privacy-policy>.

EFTA00040125