



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 17, 2016

By E-Mail – Submitted Under Seal

The Honorable Valerie E. Caproni
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. Sheldon Silver, S1 15 Cr. 093 (VEC)

Dear Judge Caproni:

Pursuant to the Court's instructions at the February 11, 2016 hearing in this matter (the "February 11 Hearing"), the Government writes to provide the Court for its consideration with proposed redactions to certain filings and transcripts in the above-captioned case. Specifically, the attached zip file contains additional proposed redactions to the Government's initial sealed motion that are intended to address concerns articulated at the February 11 Hearing about public disclosure of the source of the materials referenced in the Government's motion. The zip file also contains proposed redactions to submissions by the defendant and one of the third parties, and to the transcript of the February 11 Hearing. The Government further respectfully requests that its proposed redactions to these documents and others that previously were the subject of Government submissions to the Court be incorporated in any filing that includes the proposed redacted documents as attachments. The Government respectfully submits that its proposed redactions adequately protect the privacy rights of third parties while also preserving the public's right to access court proceedings and monitor the judicial process. *See Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 120 (2d Cir. 2006).

Respectfully submitted,

PREET BHARARA
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Southern District of New York

By: _____/s/_____
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cc by e-mail w/ encs.: Attorneys for the Defendant and Third Parties