



15cr93 USA v. Silver
Lowell, Abbe D.

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02/17/2016 05:29 PM

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4 Attachments



Gov't MIL Character Evidence - Chadbourne 2 16 2016.pdf



Opposition to MIL - Chadbourne 2 16 2016.pdf



2015.10.16 - Sealed Transcript MIL - Chadbourne 2 16 2016.pdf



Silver 2 11 2016 Transcript Chadbourne Redactions.pdf

Judge Caproni –

On behalf of our client, I submit proposed redactions to the relevant documents on Your Honor's February 11, 2016 list pursuant to the Court's order. The only documents which I believe require redactions are: (1) the Government's October 12, 2015 Motion in Limine, (2) Defense's October 15, 2015 Opposition to the

Government's Motion in Limine, (3) the October 16, 2015 Motion in Limine oral argument transcript, and (4) the February 11, 2016 transcript of the closed portion of oral argument. My redactions are highlighted and marked, taking into consideration the concerns Your Honor expressed in the February 11, 2016 hearing. Because of the details of the actual hearing last week, the February 11, 2016 transcript is more heavily redacted than the other documents. This was done to ensure that the content of the closed portion of the hearing is not used in a manner contrary to the Court's stated goals. Especially, in light of the confirmation of how many people would fit the categories or occupations or other items about which the Court inquired, these additional redactions are necessary.

With respect to items 1 through 3 above, we ask that the Court maintain the redactions proposed by the Government and add those that we provide in the attached. We also ask that documents 1 through 3 be redacted in the identical manner when provided in the record as attachments to the January 21, 2016 Letter from myself (item 11 on your list), the January 22, 2016 Letter from the Government (item 13 on your list), and the January 22, 2016 Letter from Defendant, Exhibits A-D (item 14 on your list).

Please let us know if you have any questions in this regard.

Respectfully submitted,

Abbe Lowell

Abbe David Lowell
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