



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*

May 3, 2021

BY EMAIL

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: In re Search Warrant dated April 21, 2021, 21 Mag. 4335
In re Search Warrant dated April 28, 2021, 21 Mag. 4591

Dear Judge Oetken:

The Government respectfully writes pursuant to the Court's Order, dated April 30, 2021, which directed the parties to confer regarding proposed redactions to the Government's April 29, 2021 letter. The Government and counsel for Ms. Toensing have agreed upon a set of redactions, which the Government will transmit to the Court under separate cover. Counsel for Mr. Giuliani does not oppose those redactions.

In addition, the parties have agreed upon the following briefing schedule for the Court's consideration: Mr. Giuliani and Ms. Toensing shall file any response to the Government's April 29, 2021 letter by May 10, 2021, and the Government's reply shall be filed by May 17, 2021. Given the potential need for redactions, the Government respectfully requests that each party file their letter responses under seal, and the parties be given two business days thereafter to confer regarding redactions (i.e., until May 12, 2021, and May 19, 2021, respectively).

The proposed redactions are approved and the redacted version of the government's April 29, 2021 letter is hereby made public and will be docketed.

The parties' proposed briefing schedule is approved.

So ordered:

May 4, 2021

Respectfully submitted,

AUDREY STRAUSS
United States Attorney for the
Southern District of New York

By: _____/s/_____
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Cc: Robert Costello, Esq. (counsel for Rudolph Giuliani)

Michael Bowe, Esq./ E. Patrick Gilman, Esq. (counsel for Victoria Toensing)