

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF THE APPLICATION
OF WP COMPANY LLC**

Misc. Action No. 19-0032 (ABJ)

JOINT NOTICE OF GOVERNMENT AND PAUL MANAFORT

The United States of America and Paul Manafort submit this joint notice in response to the Court's minute order dated December 6, 2019.

Movant Washington Post has filed a motion to unseal certain unredacted records from *United States v. Manafort*, No. 17-CR-201-ABJ. In its opposition to the Post's motion, the government argued that the redactions were warranted to protect ongoing investigations and the privacy rights of uncharged parties. Doc. 9, at 6. However, the government did not oppose holding the motion in abeyance for a fixed period of time, so that the government could reassess at a later date whether the redactions were still necessary. *Id.* at 14. On December 6, 2019, the Court issued a minute order directing the government and Manafort to file a joint notice advising "whether any of the sealed or redacted documents petitioner seeks may now be further unsealed in full or in part."

Having conferred with counsel for Manafort and reviewed the records at issue, the government believes that some of the redactions likely are no longer necessary. However, assessing the redactions may require consultation with other U.S. Attorney's Offices and with other components of the Justice Department. In addition, counsel for Manafort requests the opportunity to review any proposed lifting of redactions by the government and to provide the Court with Manafort's position. Accordingly, the parties request that the Court set a deadline of 60 days for the government and Manafort to submit a joint filing to the Court identifying any

records requested by the Post that can be unredacted in part or entirely, setting forth the basis for any continued redactions, and describing any points of disagreement between the government and Manafort on these matters.

Respectfully submitted,

/s/
Kevin M. Downing
(D.C. Bar No. 1013984)
Law Office of Kevin M. Downing
601 New Jersey Avenue NW, Suite 620
Washington D.C. 20001
(202) 754-1992
kevindowning@kdowninglaw.com

JESSIE K. LIU
United States Attorney

By: /s/
Jonathan Kravis
Molly Gaston
Assistant United States Attorneys
555 Fourth Street NW
Washington D.C. 20530

/s/
Thomas E. Zehnle
(D.C. Bar No. 415556)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue NW, Suite 620
Washington D.C. 20001
(202) 368-4668
tezehnle@gmail.com

/s/
Richard W. Westling
(D.C. Bar No. 990496)
Epstein Becker & Green, P.C.
1227 25th Street N.W.
Washington D.C. 20037
Tel: 202-861-1868
Fax: 202-296-2882
Email: rwestling@ebglaw.com