

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	Crim. No. 17-201-01 (ABJ)
PAUL J. MANAFORT, JR.,)	
)	
Defendant.)	

DEFENDANT PAUL J. MANAFORT, JR.'S MOTION FOR LEAVE
TO FILE OPPOSITION TO GOVERNMENT'S MOTION TO MODIFY
THE COURT'S SCHEDULE FOR RULE 404(b) NOTICE AND BRIEFING

Defendant Paul J. Manafort, Jr., by and through counsel, hereby moves for leave to file an opposition to the Government's Motion to Modify the Court's Schedule for Rule 404(b) Notice and Briefing ("Government's Motion"). (Dkt. # 155). The Government's Motion was filed in response to the Minute Order entered on January 17, 2018.

In the Court's order, the parties were instructed to "notify the Court if they have any objections to this schedule *as a whole* by January 19, 2018." See Jan. 17, 2018 Minute Order (emphasis supplied). The defendant understood the Court's order to mean that the scheduling order should be considered in toto, taking into account all filing deadlines for motions, the time allotted for oppositions and replies, etc. Simply put, the defendant understood that the parties should notify the Court only if they objected to the overall schedule – not to any specific deadlines. Otherwise, the words "as a whole" would be superfluous in the Minute Order.

The Government, however has moved to modify the scheduling order with respect to a specific deadline set forth in the overall schedule established by the Court; *i.e.*, the

notice and briefing of Rule 404(b) evidence. (Dkt. # 155). Accordingly, Mr. Manafort seeks leave to respond to the Government's Motion if the Court is inclined to consider the specific modification to its schedule as a whole, as set forth in the Minute Order dated January 17, 2018.

Dated: January 24, 2018

Respectfully submitted,

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DOJ, OSC AND THE PRESS

10/27/2017 Affidavit for seizure warrant

p6 para 14

PM's spokesman subpoenaed - turned over two memos from PM to Rinat Akhmetov from 2005 re: activities for party of regions

memos received by Maloni from AP

FN 3 –

the same reporter wrote a series of articles about PM's work for POR and UKR officials

In the Winter of 2017 (sic 2016) employee of DMI –CS-1 permitted the reporter to view material on a hard drive copy of DMI's electronic files

Government obtained warrant for the hard drive

The same reporter published an article on April 12, 2017 a "black ledger" payments from POR to PM

- That ledger appeared to detail payments to PM

- The article reported that DMI records showed that at least two payments were made to DMI that correspond to payments noted on the "black ledger"

- PM through Maloni said he was paid according to his clients preferred financial institutions and instructions