

# Inner City Press

January 14, 2022

By E-mail

Hon. Alison J. Nathan, United States District Judge  
Southern District of New York, 40 Foley Square, New York, NY 10007

Re: US v. Maxwell, 20-cr-330 (AJN), Press request that Juror 50's motion be acknowledged as a judicial document and docketed, as this request should be

Dear Judge Nathan:

On behalf of Inner City Press and in my personal capacity, I have been covering the above-captioned case, including repeatedly asking that sealing and redactions be reduced and that a public call-in line be provided (it wasn't).

Juror 50's motion was withheld, it was said, to allow the US and defense to propose redactions. Now in a second "upon further reflection" Juror 50's motion is still being withheld, apparently under the theory or argument that it is not a judicial document even though it seems obvious that it has been and is being considered by the court. In plain language, it is a judicial document and withholding it, with all due respect, ill-serves the public interest in this trial.

Juror 50's motion, and this request, should be docketed. There are other unaddressed public access issues:

On January 5 the government and the defense submitted significantly redacted letters about juror "Scotty David" and his print and video interviews, requesting an inquiry or a new trial. But the public and press have a right to know what the US and defense are arguing to the Court. Accordingly, the redactions should be removed forthwith, and all other relevant still-sealed or redacted documents be placed in the public docket

While appreciating that the Court docketed before denying Inner City Press' November 12 request for a call-in line, Dkt. 451, this is a request that this opposition to sealing be docketed as took place in *US v. Avenatti*, 19-cr-374 (JMF), Dkt 85, see <https://storage.courtlistener.com/recap/gov.uscourts.nysd.516151/gov.uscourts.nysd.516151.85.0.pdf>

If deemed necessary, PLEASE TAKE NOTICE that Inner City Press and its undersigned reporter, in personal capacity, will move this Court before Honorable Alison J. Nathan, U.S. District Judge for the Southern District of New York, at a date and time directed by the Court, for entry of an order granting permission to be heard on unsealing the improperly redacted

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submissions of January 5, 2022, and unsealing of documents related to juror(s) esp Scotty David  
- including the needed docketing of his / Juror 50's motion.

Please confirm receipt and docket this responsive filing (see eg in this case, Dkt 363 and 451),  
make Inner City Press an Interested Party (as in Dkt 362), and thank you for your attention.

Respectfully submitted,

/s/

Matthew Russell Lee, Inner City Press

cc: Alison Moe, Maurene Comey at DOJ; Counsel Sternheim and Everdell