

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

HISTORY ASSOCIATES,
INCORPORATED,

Plaintiff,

v.

U.S. SECURITIES AND EXCHANGE
COMMISSION,

Defendant.

CIVIL NO. 24-1858

Friday, November 8, 2024

TRANSCRIPT OF PRE-MOTION CONFERENCE

BEFORE THE HONORABLE JUDGE ANA C. REYES
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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COURT REPORTER:

CHANDRA R. KEAN, RMR

Official Court Reporter

333 Constitution Avenue, NW

Washington, DC 20001

14:00:17

PROCEEDINGS

(Court called to order at 1:59 p.m.)

13:59:47 3 DEPUTY COURTROOM CLERK: This is Civil Action
13:59:49 4 24-1858, History Associates, Incorporated v. U.S.
13:59:54 5 Securities and Exchange Commission.

13:59:55 6 Would the parties please come forward and identify
13:59:57 7 themselves for the record, starting with plaintiff's
14:00:00 8 counsel.

14:00:02 9 MR. BOND: Good afternoon. May it please the
14:00:04 10 Court, Jonathan Bond for History Associates. With me at
14:00:08 11 counsel table is Nick Harper and Aaron Hauptman with
14:00:13 12 Gibson, Dunn & Crutcher.

14:00:13 13 THE COURT: Good afternoon.

14:00:15 14 MS. VERDI: Good afternoon, Your Honor. Mary
14:00:18 15 Verdi for the SEC. And at the table with me is my
14:00:22 16 supervisor, Melinda Hardy.

14:00:25 17 THE COURT: Can you stay up for a moment? I
14:00:26 18 thought the last time you were in front of me we figured
14:00:29 19 this thing out.

14:00:30 20 MS. VERDI: I don't believe we have appeared
14:00:32 21 before you yet, Your Honor, in this case.

14:00:40 22 MR. BOND: That's a different case involving
14:00:42 23 the FDIC.

14:00:44 24 THE COURT: That clears up a lot.

14:00:46 25 So you all, so far as I can tell, got a bunch of

14:01:02 1 documents to respond to this FOIA request. You took it
14:01:05 2 through the 7(A) analysis?

14:01:08 3 MS. VERDI: Yes, we did, Your Honor.

14:01:09 4 THE COURT: Okay. And -- but you didn't do it
14:01:11 5 on a document-by-document basis. You kind of just did
14:01:14 6 it in categories.

14:01:15 7 MS. VERDI: At the time of the determinations,
14:01:16 8 yes, that is true, Your Honor.

14:01:17 9 THE COURT: Okay. And now the 7(A) exemption
14:01:19 10 no longer exists because the litigation is over, or the
14:01:22 11 investigation is over or something?

14:01:24 12 MS. VERDI: The investigations have either
14:01:25 13 ended or other affected proceedings have changed, the
14:01:28 14 status has changed. And, therefore, we don't believe
14:01:30 15 that 7(A) would apply to a majority of the documents
14:01:32 16 that are responsive.

14:01:33 17 THE COURT: But what documents would they apply
14:01:34 18 to? Do you have categories of documents that they would
14:01:37 19 apply to?

14:01:38 20 MS. VERDI: We have not yet reviewed them to
14:01:41 21 see if there are still 7(A) documents -- or documents
14:01:43 22 that would have 7(A) withholdings appropriate. And so
14:01:48 23 it is possible that there are certain documents that are
14:01:50 24 responsive that 7(A) would still apply to, but we have
14:01:53 25 not yet determined that.

14:01:54 1 THE COURT: Okay. So part of the investigation
14:01:55 2 is still ongoing or why?

14:01:56 3 MS. VERDI: That's correct, Your Honor, yes.

14:01:58 4 THE COURT: Okay.

14:02:06 5 I'm not quite sure what to do here because I'm a
14:02:10 6 little bit at a loss as to why you all thought that you
14:02:14 7 could just do a 7(A) analysis on the first go-around and
14:02:18 8 then if that -- I mean, it's going to go away sooner or
14:02:21 9 later -- then do the actually FOIA review.

14:02:23 10 I mean, you don't -- I'm not sure where that came
14:02:26 11 from, but we are where we are. And I'm not going to
14:02:29 12 give you three years to figure this out. Like, that's
14:02:32 13 not happening.

14:02:33 14 MS. VERDI: Understood, Your Honor. And we are
14:02:35 15 happy to work with the plaintiffs. We would like to be
14:02:37 16 reasonable and work together to figure out a timeline
14:02:39 17 that makes sense for processing of responsive records.

14:02:42 18 THE COURT: Well -- okay. You can be seated.
14:02:48 19 What's your suggested approach?

14:02:50 20 MR. BOND: So, Your Honor, we suggest that the
14:02:52 21 Court deal with this on two tracks.

14:02:54 22 Now, the only numbers of documents that they've
14:02:56 23 identified for us are the third-party documents that the
14:03:00 24 SEC received that they didn't generate. They've
14:03:03 25 identified rough numbers of those, of more than 130,000.

14:03:04 1 So our proposal is set those aside. We'll work
14:03:08 2 with them on a plan for producing and reviewing those on
14:03:10 3 a rolling basis. But the other documents, the ones that
14:03:12 4 the SEC itself generated, we think we should be prepared
14:03:16 5 to litigate now.

14:03:17 6 And so the SEC, we suggest, should get a certain
14:03:20 7 amount of time to prepare its Vaughn Index for those
14:03:20 8 remaining documents --

14:03:20 9 THE COURT: Whoa, you need to slow way down --

10 MR. BOND: Sure.

14:03:22 11 THE COURT: -- because I'm having trouble
14:03:25 12 keeping up, and so then the court reporter is having
14:03:25 13 trouble keeping up.

14 MR. BOND: Absolutely.

14:03:25 15 THE COURT: Okay. Start again.

14:03:27 16 MR. BOND: Absolutely. So there are the two
14:03:29 17 sets of documents. The only set that the SEC has
14:03:33 18 quantified are the third-party documents produced or
14:03:35 19 provided to the SEC but generated by third parties.

14:03:39 20 They've told us --

14:03:39 21 THE COURT: What FOIA exception would there be
14:03:41 22 for that anyway?

14:03:43 23 MR. BOND: It's not at all clear to us what
14:03:45 24 those -- what exception would apply to those, and all
14:03:47 25 they've asserted is 7(A), so it's kind of a mystery to

14:03:51 1 us. But their point is there are so many documents, it
14:03:54 2 will take a really long time to review them.

14:03:57 3 So our suggestion is, let's work with them on a
14:03:58 4 rolling production of those documents. But meanwhile,
14:03:59 5 the documents that the SEC itself generated, we think
14:04:03 6 they should be in a position to produce the Vaughn Index
14:04:06 7 so that we can move forward with summary judgment on any
14:04:09 8 where we're not satisfied with the Index, just like Your
14:04:12 9 Honor ordered in the FDIC case.

14:04:17 10 THE COURT: What kind of documents are those
14:04:18 11 with the SEC? Would those have been the letters that
14:04:20 12 they wrote or --

14:04:21 13 MR. BOND: So we've requested communications by
14:04:24 14 the SEC to third parties, public communications,
14:04:28 15 internal files that would not be exempt. There are --
14:04:31 16 we have three requests at issue. The one for Ethereum
14:04:33 17 is not even about an investigation. It's about --

14:04:36 18 THE COURT: You have to slow down. I'm having
14:04:37 19 trouble keeping up.

14:04:38 20 MR. BOND: Sorry. Apologies, Your Honor.

14:04:40 21 THE COURT: No, it's fine.

22 MR. BOND: Yeah. The --

14:04:42 23 THE COURT: Okay. What kind of documents does
14:04:43 24 the SEC have? The documents that they sent to third
14:04:47 25 parties?

14:04:47 1 MR. BOND: It would include documents sent to
14:04:49 2 third parties.

14:04:49 3 THE COURT: Okay. And what else?

14:04:50 4 MR. BOND: We've asked for any documents the
14:04:52 5 SEC has that relate to the switch for Ethereum from
14:04:55 6 proof of work to proof of stake, which happened in 2022.

14:04:59 7 THE COURT: Well, aren't those going to be
14:05:01 8 protected by some deliberative privilege?

14:05:03 9 MR. BOND: Some might, but we're not limiting
14:05:06 10 our request to the SEC's policy with respect to those,
14:05:08 11 just documents that the SEC possesses, that it
14:05:11 12 generated, including communications to third parties
14:05:13 13 that the SEC made. Also, you know, public statements
14:05:16 14 that the SEC might have made -- the Chair has made
14:05:19 15 speeches about this.

14:05:20 16 So we know that some documents exist. We don't
14:05:22 17 know what they are because the SEC hasn't told us
14:05:24 18 anything about the content of the documents. When we
14:05:26 19 first made the request, they said they had zero
14:05:28 20 responsive documents. And then when we filed our
14:05:31 21 appeal, they said they have some unknown number of
14:05:35 22 documents, but all of them are exempt under 7(A).

14:05:37 23 Now, we don't think that can be right. And so we
14:05:39 24 think the right approach moving forward is for the SEC
14:05:42 25 to produce a Vaughn Index, identify what the documents

14:05:46 1 are, how many there are, and what exemptions they want
14:05:49 2 to assert. And then we can move forward with summary
14:05:52 3 judgment briefing.

14:05:52 4 THE COURT: If they're public, can't you just
14:05:52 5 Google -- I mean, can't I just get on Google right now
14:05:54 6 and figure out what they've said or done or -- I mean,
14:05:56 7 if it's public, I'm not sure that that's really what you
14:05:57 8 want them focused on.

14:05:59 9 MR. BOND: Well, the public ones are not the
14:06:00 10 principal focus, but the point is they are included
14:06:03 11 within the scope of the request. But documents that
14:06:05 12 they've sent to third parties that are not privileged, I
14:06:07 13 think they should have to produce. And at a minimum, we
14:06:10 14 should be able to litigate with them any arguments they
14:06:13 15 might have about the documents that they've sent to
14:06:16 16 third parties.

14:06:16 17 THE COURT: Okay. All right.

14:06:18 18 Can I see you again?

14:06:23 19 The 130,000 documents that are documents from third
14:06:28 20 parties, are those like briefs or letters that they've
14:06:30 21 sent you or are those just, like, you know, documents
14:06:34 22 that otherwise existed and they just picked up and sent
14:06:36 23 to you?

14:06:38 24 MS. VERDI: I'm not sure I can answer that
14:06:42 25 question specifically, Your Honor. My understanding is

14:06:44 1 that those are records that third parties provided in
14:06:49 2 response to subpoenas, but SEC enforcement officers sent
14:06:53 3 them. And as a result --

14:06:54 4 THE COURT: What privilege would there be over
14:06:55 5 those?

14:06:56 6 MS. VERDI: Exemption 4. It is possible -- so
14:06:59 7 there are over 130,000 pages of records produced only by
14:07:02 8 third parties that we would have to look at to find out
14:07:04 9 if there would be any exemption for withholdings
14:07:07 10 appropriate.

14:07:22 11 THE COURT: And how many of the other types of
14:07:24 12 documents do you all have?

14:07:25 13 MS. VERDI: So the requests are extremely
14:07:29 14 broad. The requests are for all records relating to two
14:07:33 15 parties: Enigma MPC and Zachary Coburn. It's not
14:07:38 16 limited in any way.

14:07:38 17 And then the third FOIA request at issue seeks
14:07:42 18 records about the Ethereum shift of proof -- and my
14:07:48 19 understanding is that is a very broad request is for any
14:07:52 20 document about that issue within the SEC.

14:07:54 21 And so as a result, we would have to speak with
14:07:58 22 enforcement staff and other staff within the SEC to
14:08:00 23 determine the volume of every record that could be
14:08:03 24 responsive to these very broad requests.

14:08:05 25 THE COURT: Well, why hasn't that already

14:08:07 1 happened? I mean, how long has this been pending?

14:08:09 2 MS. VERDI: Our determinations were sent out in
14:08:11 3 connection with these three requests I believe in
14:08:13 4 December 2023 and January and February of 2024.

14:08:16 5 THE COURT: So why haven't you already looked
14:08:17 6 into how many documents are responsive? I'm just
14:08:21 7 confused as to what we're doing here in November.
14:08:24 8 Nothing, so far as I can tell, has happened other than
14:08:27 9 that you said, "Oh, 7(A) applies."

14:08:29 10 Magic wand. We don't have to do anything else.

14:08:32 11 I mean, so far as I can tell, that's what has
14:08:33 12 happened.

14:08:33 13 MS. VERDI: So at the time that we sent our
14:08:35 14 responses to the FOIA request and our responses to
14:08:38 15 History Associates' appeal to those responses to the
14:08:41 16 FOIA requests, 7(A) applied broadly to records
14:08:44 17 responsive to these requests.

14:08:44 18 THE COURT: Okay. But you know 7(A) at some
14:08:45 19 point is going to be extinguished, right?

14:08:48 20 MS. VERDI: Yes, Your Honor.

14:08:49 21 THE COURT: Okay. So on what basis did you all
14:08:52 22 think to yourselves: "You know what? We're just going
14:08:52 23 to kick this can down the road"?

14:08:52 24 MS. VERDI: Our determination at the time was
14:08:53 25 based on that moment in time. And the FOIA --

14:08:55 1 THE COURT: No, I understand that at that
14:08:58 2 moment in time you thought 7(A) applied, right?

14:09:00 3 MS. VERDI: Yes, Your Honor.

14:09:01 4 THE COURT: But that moment of time you knew
14:09:03 5 that at some point 7(A) would be extinguished.

14:09:06 6 MS. VERDI: Yes, Your Honor. But our
7 obligation --

8 THE COURT: Okay. So, so --

14:09:08 9 MS. VERDI: Excuse me, sorry.

14:09:08 10 THE COURT: No, it's fine. So why did you all
14:09:09 11 think it was okay to just say 7(A) writ large, and then
14:09:13 12 whenever that investigation ends, then we'll actually
14:09:15 13 start the actual review?

14:09:16 14 MS. VERDI: Our obligation under the FOIA is
14:09:19 15 not to continue to respond to FOIA requests and provide
14:09:22 16 updates to FOIA requests. My understanding is that
14:09:23 17 typically when requests to seek records that are
14:09:26 18 withheld in full under 7(A) --

14:09:26 19 THE COURT: Both of you need to slow -- I don't
14:09:29 20 know what's going on today, but -- am I, like, being
14:09:31 21 overly sensitive here?

22 MS. VERDI: I apologize.

23 THE COURT: Okay. I don't know what is going
14:09:35 24 on today, but, like, if I'm having trouble keeping up
14:09:36 25 with both of you, something is going -- like, you guys

14:09:38 1 are talking way too fast. Because I'm a very fast
14:09:41 2 talker, so it's not usually a problem for me. So let's
14:09:45 3 all try to slow down.

14:09:46 4 So your view is at a moment in time that's when we
14:09:51 5 respond to FOIA. And if 7(A) extinguishes at some other
14:09:56 6 point in time, then it's up to them to update their FOIA
14:09:58 7 request.

14:09:58 8 MS. VERDI: Yes. Or at the time -- so now --
14:10:00 9 so as of February 2024 at the latest, we determined 7(A)
14:10:04 10 applied to everything. Plaintiff filed their lawsuit in
14:10:07 11 June, and we said, okay, 7(A) does not apply, we think,
14:10:12 12 to the majority of the records, so let's work together
14:10:14 13 to figure out a workable volume of records that we can
14:10:17 14 process and make determinations about.

14:10:20 15 And that's where we are now, I believe, Your Honor.

14:10:24 16 THE COURT: How long is it going to take you
14:10:26 17 all to get a Vaughn Index together, putting aside the
14:10:30 18 130,000 documents?

14:10:31 19 MS. VERDI: Of every record responsive to the
14:10:36 20 FOIA request?

14:10:37 21 THE COURT: I don't know -- whatever you need
14:10:38 22 to do to put a Vaughn Index together. I don't know.

14:10:41 23 MS. VERDI: I think it would take us an
14:10:42 24 extremely long time if there's over 130,000 records.

14:10:45 25 THE COURT: The Vaughn Index doesn't usually go

14:10:48 1 record by record, does it?

14:10:49 2 MS. VERDI: For a categorical Vaughn Index, we
14:10:52 3 still need to ascertain the entire volume of all the
14:10:54 4 records responsive to their requests, which is going to
14:10:56 5 be thousands and thousands of records. And reviewing
14:10:59 6 them and filing them will take a considerable amount of
14:11:02 7 time.

14:11:02 8 THE COURT: Okay. You can be seated.

14:11:04 9 Can I see you again?

14:11:05 10 What documents do you actually -- what do you
14:11:07 11 really -- like what is the core of what you actually
14:11:10 12 got?

14:11:10 13 Because here's the thing: You have very broad FOIA
14:11:14 14 requests, right? And if you want to stand on those
14:11:17 15 broad FOIA requests, by all means. But then it's going
14:11:20 16 to be -- you know, I'm going to be retired on a beach
14:11:23 17 somewhere before you get the Vaughn Index, it sounds
14:11:26 18 like.

14:11:26 19 Now, what are the documents that you actually, at
14:11:28 20 core, want? Because I can order her to look at those
14:11:33 21 documents first, but if she's telling me that she's
14:11:36 22 going to have to review every, you know, document that
14:11:38 23 ever existed from any tree in the world, it's going to
14:11:41 24 be a while.

14:11:42 25 MR. BOND: So I'd say two things: First, of

14:11:45 1 course, it's difficult for us to know exactly what
14:11:48 2 documents they have because --

14:11:50 3 THE COURT: But you guys want to know -- you
14:11:52 4 guys want to know what laws or what regulations are
14:11:55 5 going to -- or are dealing with digital currencies?

14:12:00 6 MR. BOND: I think the principal issue on the
14:12:03 7 main request regarding Ethereum is that Ethereum went
14:12:08 8 through this change from one form of validation to
14:12:10 9 another. The Chair has suggested that that has some
14:12:12 10 bearing on its classification as a security or not, and
14:12:15 11 has never explained that. And we're trying to get to
14:12:17 12 the bottom of what's going on.

14:12:19 13 THE COURT: Okay. What -- there must be some
14:12:21 14 set of documents that explain that without you having to
14:12:25 15 go through everything.

14:12:29 16 Why don't you both come up for a bit.

14:12:34 17 Do you agree that the director -- is this something
14:12:36 18 that the director has said publicly?

14:12:38 19 MR. BOND: I believe he has made public
14:12:40 20 statements about the relevance of this change, but he
14:12:42 21 has not explained what about the change from one method
14:12:45 22 to another bears on its classification as a security.

14:12:48 23 THE COURT: Okay. That doesn't seem like a ton
14:12:50 24 of documents. Why can't we just get with the director's
14:12:53 25 office and see what he meant?

14:12:55 1 MS. VERDI: I think we would be open to
14:12:56 2 narrowing that request to that sort of much smaller
14:13:02 3 corpus of records.

14:13:03 4 THE COURT: Okay. What else?

14:13:04 5 MR. BOND: So I think we're looking not just
14:13:06 6 for statements concerning the director's mindset but
14:13:08 7 what the agency has been thinking and saying to third
14:13:11 8 parties or internally about this development.

14:13:13 9 We don't know what's been said. We don't know how
14:13:15 10 many documents --

14:13:16 11 THE COURT: Okay, but -- look, look, look,
14:13:23 12 look. Look, if you want anything that's been said about
14:13:27 13 it, that's fine, but you're not going to get anything
14:13:29 14 for quite a while.

14:13:30 15 If we -- why don't we start with a subset of --
14:13:34 16 have her focus first on what information the director
14:13:40 17 has given to his subordinates about this issue or what
14:13:46 18 information the director considered in issuing those
14:13:51 19 public responses. Why don't we start there and see if
14:13:53 20 that gives us a roadmap to ask for more specific
14:13:56 21 documents?

14:13:57 22 That, I can have them do very quickly. If you want
14:14:00 23 everything else that -- I'm going to give them more
14:14:04 24 time.

14:14:05 25 MR. BOND: I think we would be open to that as

14:14:06 1 an initial step without prejudice to fighting over --

14:14:09 2 THE COURT: Of course.

14:14:10 3 MR. BOND: Once we learn, as you say, what --
14:14:11 4 you know, we can make a roadmap once we've seen what's
14:14:14 5 there. But I think, at a minimum, we would need to
14:14:16 6 start with that.

14:14:17 7 THE COURT: Okay. All right. What else at a
14:14:18 8 minimum is at the core of what you want?

14:14:20 9 MR. BOND: I think if there are any
14:14:22 10 communications that the SEC has sent to third parties
14:14:24 11 about that issue, I think that should be an easy thing
14:14:27 12 for them to identify.

14:14:27 13 THE COURT: That seems like an easy thing for
14:14:29 14 you all to identify.

14:14:30 15 What if we just start with those two? I will give
14:14:33 16 you two months to put together the Vaughn Index on those
14:14:39 17 categories of documents. Then after you get the Vaughn
14:14:41 18 Index and the documents, you tell me -- you guys send me
14:14:45 19 a joint status report after you've had a chance to
14:14:47 20 review them and then we'll go from there.

14:14:51 21 Yes?

14:14:51 22 MR. BOND: Yes.

14:14:52 23 MS. VERDI: I think that's workable, Your
14:14:54 24 Honor. Thank you.

14:14:54 25 THE COURT: Okay. Why don't you send them a

14:15:00 1 letter that says -- that's stated on the record without
14:15:03 2 prejudice to arguments down the road and without
14:15:06 3 narrowing the FOIA request, as an initial step: We
14:15:09 4 would like the documents that the director considered,
14:15:17 5 documents regarding the basis for the change and what
14:15:22 6 the thinking -- or what -- the reason for the change at
14:15:24 7 the director level, and then any -- any correspondence.

14:15:33 8 Let's start with a letter correspondence from the
14:15:38 9 agency to third parties about this issue. And identify
14:15:40 10 the issue so that she knows exactly what she's looking
14:15:43 11 for.

14:15:44 12 MR. BOND: Understood.

14:15:45 13 THE COURT: Do not do what every lawyer in
14:15:47 14 America is inclined to do when they send out a request.
14:15:50 15 Do not make this broader by adding catchall phrases or
14:15:55 16 words or whatnot than what we're envisioning here, okay?

14:15:58 17 I just want you to put on paper what we are
14:16:02 18 envisioning, which is an initial, small subset of things
14:16:05 19 so that she can get working on that quickly and you can
14:16:07 20 get something quickly to start chewing over. And then
14:16:10 21 you can decide what more you need. All right?

14:16:17 22 MR. BOND: Understood.

14:16:17 23 THE COURT: Okay.

14:16:19 24 All right?

14:16:19 25 MS. VERDI: Your Honor, that sounds like a

1 workable way forward for now -- oh, excuse me. I'm so
2 sorry.

14:16:20 3 And I just want to say that, you know, I have no
14:16:23 4 sense whether there are records that are responsive to
14:16:25 5 this, if they exist or what it will look like, but we
14:16:28 6 will conduct a search for the records that --

14:16:30 7 THE COURT: Okay. Well, I want something to
14:16:31 8 actually get to him within 60 days. If there are
14:16:34 9 documents that -- if there are no documents, you can say
14:16:36 10 there are no documents.

11 MS. VERDI: Sure.

14:16:36 12 THE COURT: And then you guys can try to figure
14:16:38 13 out another small subset of something, right?

14:16:40 14 But you know what he wants. He wants to figure out
14:16:44 15 the basis for the change, I suppose, so that your
14:16:46 16 clients could -- or so that companies can know what's
14:16:49 17 coming down the pike and why it's happening.

14:16:51 18 Right?

14:16:52 19 MR. BOND: That's right.

14:16:54 20 THE COURT: Okay. At the end of the day that's
14:16:55 21 what he wants.

14:16:56 22 So you guys work together. If this first step
14:16:57 23 doesn't work out, you guys try to figure out some way to
14:16:59 24 get him what he wants without having to look at every
14:17:03 25 document ever created on this issue.

14:17:05 1 Okay?

14:17:05 2 MR. BOND: And if I could just add, you know,
14:17:07 3 one thing on the Vaughn Index itself that they're going
14:17:08 4 to produce, it would be, I think, appropriate and very
14:17:10 5 helpful if it identifies whatever exemptions they would
14:17:12 6 intend to assert as to those documents so that we get
14:17:14 7 this, you know, once -- once for all.

14:17:16 8 THE COURT: Good?

14:17:17 9 MS. VERDI: We fully intend to do that, yes.

14:17:19 10 THE COURT: Perfect. All right. Good luck.

14:17:22 11 (Court in recess, 2:17 p.m.)

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CERTIFICATE

I, Chandra Kean, RMR, certify that the foregoing is
a correct transcription from the record of proceedings
in the above-titled matter.



Chandra Kean, RMRNovember 13, 2024

DATE