

Moran, Christopher R. (TAX)

From: Eric Benson <EBenson@rqn.com>
Sent: Thursday, September 21, 2017 4:16 PM
To: Moran, Christopher R. (TAX)
Cc: Hines, Erin R. (TAX); Healy Gallagher, Erin (TAX)
Subject: RE: USA v. RaPower-3 - Mantyla Document Production

Chris:

Thanks for the clarification. Sorry if the letter misidentified the Bates Range numbers. Just so we are clear, we do not wish to designate any materials as confidential at this point per the court's order and in compliance with the government's request.

Best,
Eric

From: Moran, Christopher R. (TAX) [mailto:Christopher.R.Moran@usdoj.gov]
Sent: Thursday, September 21, 2017 2:12 PM
To: Eric Benson
Cc: Hines, Erin R. (TAX); Healy Gallagher, Erin (TAX)
Subject: USA v. RaPower-3 - Mantyla Document Production

Eric:

Thank you for your letter of September 15, 2017 re. Mantyla McReynolds' revised document production and the attached disk. Your letter states that the confidentiality designations for documents MM00001-4144 are removed. However that was not the entire range of your client's production- it went from MM00001-4410. Our letter of September 7 challenged several documents between MM0004145-4410 (i.e., Exhibits 372, 373, 376, and 377).

You don't need to send us anything else- by the terms of the protective order, the confidentiality designation was waived because there was no explanation of the confidentiality designation provided within 5 days of our challenge (See ECF Doc. 116, para 8(b)). As a courtesy, I wanted you to know that we will be treating the entire Bates range as non-confidential. Or course, if anything is filed with the Court, it will be redacted in accordance with Fed. R. Civ. P. 5.2.

Thanks.

Chris Moran

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**Plaintiff
Exhibit**

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