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EXHIBIT A

Case 1:15-cv-07433-LAP Document 1209-1 Filed 02/05/21 Page 2 of 24 Defendant's Position on Docket Entries 345, 356, 362, 370, 422, 468 640

DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
345	8.9.16	Redact all citations to J. Sweet 4/16/16 Sealed Order consistent with partially redacted Order at DE 135. Otherwise, no position.		
344	8.9.16	Not sealed		Not Sealed
346	8.9.16	No objection to unsealing		
346-1	8.9.16	No objection to unsealing		
346-2	8.9.16	No objection to unsealing		
346-3	8.9.16	No objection to unsealing		
346-4	8.9.16	Unsealed by Second Circuit		Unsealed
346-5	8.9.16	Keep sealed – The parties agreed to appropriate redactions and the redacted version of the Order was filed at DE 135.		
383	8.19.16	Redact all citations to J. Sweet 4/16/16 Sealed Order consistent with partially redacted Order at DE 135. Otherwise, no position.		
384	8.19.16	No objection to unsealing		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
384-1	8.19.16	Unsealed by Second Circuit		Unsealed
385	8.19.16	No objection to unsealing		
386	8.19.16	No objection to unsealing		
387	8.19.16	Not sealed		Not sealed
397	8.24.16	Redact all citations to J. Sweet 4/16/16 Sealed Order consistent with partially redacted Order at DE 135. Otherwise, no position.		
398	8.24.16	Unseal, excerpt paragraph 7 referencing Non-Party Doe.		
398-1	8.24.16	No objection to unsealing		
398-2	8.24.16	Public document.		
398-3	8.24.16	No objection to unsealing		
398-4	8.24.16	Partially unsealed on remand	Previously objected to	Partially unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
398-5	8.24.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1; CI-2; CI-3; CI-4; CI-5; CI-6; CI-7	Court ordered other excerpts from this Doe to remain sealed (#338- 9)
356	8.11.16	Partially unsealed on remand.	Previously objected to	Partially unsealed
357	8.11.16	Partially unsealed on remand.	Previously objected to	Partially unsealed
357-1	8.11.16	Keep sealed – Non-Party reliance on Protective Order & release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Court ordered remain sealed
357-2	8.11.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence; Non-Party Notice sent to this Doe returned as undelivered.	CI-7	Court ordered remain sealed
357-3	8.11.16	Unsealed on remand.	Previously objected to	Unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>С/I[1]</u>	Status
357-4	8.11.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-1; CI-2; CI- 3; CI-4; CI-5; CI-6; CI-7	
357-5	8.11.16	Unsealed on remand.	Previously objected to	Unsealed
357-6	8.11.16	Partially unsealed on remand, as redacted in DE 264-1.		Partially unsealed
357-7	8.11.16	Partially unsealed on remand.	Previously objected to; CI- 1, CI-2, CI-3, CI-4, CI-5, CI- 7	Partially unsealed
357-8	8.11.16	Partially unsealed on remand.	Previously objected to	Partially unsealed
367	8.12.16	Partially unsealed on remand.	Previously objected to	Partially unsealed
367-1	8.12.16	Keep sealed – Non-Party reliance on Protective Order & release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Court ordered remain sealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
367-2	8.12.16	Keep sealed – Non-Party reliance on Protective Order & release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence; Non-Party Notice sent to this Doe returned as undelivered.	CI-7	Court ordered remain sealed
367-3	8.12.16	Unsealed on remand.	Previously objected to	Unsealed
367-4	8.12.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial	CI-1; CI-2; CI- 3; CI-4; CI-5; CI-6; CI-7	Court ordered remain sealed
367-5	8.12.16	Unsealed on remand.	Previously objected to	Unsealed
367-6	8.12.16	Partially unsealed on remand, as redacted in DE 264-1.		Partially unsealed
367-7	8.12.16	Partially unsealed on remand.	Previously objected to; CI- 1, CI-2, CI-3, CI-4, CI-5, CI- 7	Partially unsealed
367-8	8.12.16	Partially unsealed on remand.	Previously objected to	Partially unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
368	8.12.16	Ruled on in Round 2 Unsealing		Partially unsealed
369	8.12.16	Ruled on in Round 2 Unsealing		
369-1	8.12.16	Ruled on in Round 2 Unsealing		Partially Unsealed
369-2	8.12.16	Ruled on in Round 2 Unsealing		Partially unsealed
369-3	8.12.16	Ruled on in Round 2 Unsealing		Partially unsealed
369-4	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-5	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-6	8.12.16	Ruled on in Round 2 Unsealing	CI-1; CI-2; CI- 3; CI-4; CI-5; CI-6; CI-7	Sealed
369-7	8.12.16	Ruled on in Round 2 Unsealing		Partially unsealed
369-8	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-9	8.12.16	Ruled on in Round 2 Unsealing		Unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
369-10	8.12.16	Ruled on in Round 2 Unsealing		Unsealed
369-11	8.12.16	Ruled on in Round 2 Unsealing		Partially unsealed
369-12	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-13	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-14	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-15	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
369-16	8.12.16	Ruled on in Round 2 Unsealing	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Sealed
362	8.11.16	Not Sealed		Not sealed
363	8.11.16	No position		
363-1	8.11.16	Unsealed by Second Circuit		Unsealed
363-2	8.11.16	Partially unsealed by Second Circuit		Partially unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
363-7	8.11.16	Excerpts partially unsealed by Second Circuit and on remand by this Court; redact all Non-Parties names and identifying information; unsure whether subject to protective order in another matter		Partially Unsealed
363-13	8.11.16	No position		Redacted
364	8.11.16	No position		
382	8.19.16	No position		
406	8.29.16	No position		
407	8.29.16	No position		
407-1	8.29.16	Publicly available document		
407-2	8.29.16	Unsealed by Second Circuit		
407-3	8.29.16	Publicly available document		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
407-4	8.29.16	Redact names and identifying information of Ms. Maxwell and all Non-Parties, except Dershowitz and Does 1 and 2; unknown whether subject to protective order in another case	CI-1, CI-2, CI- 3, CI-4	
407-5	8.29.16	Publicly available document		
407-6	8.29.16	Partially released by Second Circuit; redact names and identifying information of Ms. Maxwell and all Non-Parties, except Dershowitz and Does 1 and 2.	CI-1, CI-2, CI- 3, CI-4	Partially unsealed
407-7	8.29.16	Publicly available document		
407-8	8.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1.	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Court previously ordered this Doe's transcripts to remain sealed
407-9	8.29.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
407-10	8.29.16	No position re: depo; no objection to unsealing publicly available article		Sealed; Court previously ruled other Recarey depo excerpts unsealed except Non- Party info
407-11	8.29.16	No objection to unsealing. Publicly available documents		
407-12	8.29.16	No objection to unsealing. Publicly available documents		
407-13	8.29.16	No objection to unsealing		
407-14	8.29.16	No position; unknown whether subject to any other protective order or court sealing		
407-15	8.29.16	No position; unknown whether subject to any other protective order or court sealing		
407-16	8.29.16	No position; unknown whether subject to any other protective order or court sealing		
407-17	8.29.16	No position; unknown whether subject to any other protective order or court sealing		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
407-18	8.29.16	No position; unknown whether subject to any other protective order or court sealing		
407-19	8.29.16	Not sealed		Not sealed
407-20	8.29.16	Publicly available document		
407-21	8.29.16	Publicly available document		
407-22	8.29.16	Publicly available document		
407-23	8.29.16	Publicly available document		
408	8.29.16	Keep sealed; potential witness in criminal trial; argument of counsel violative of Local Criminal Rule 23.1.		
408-1	8.29.16	Keep sealed; potential witness in criminal trial; argument of counsel violative of Local Criminal Rule 23.1.		
408-2	8.29.16	No objection to unsealing.		
408-3	8.29.16	No objection to unsealing. Publicly available document		
408-4	8.29.16	No objection to unsealing. Publicly available document		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
435	9.15.16	No position		
435-1		Not sealed		Not sealed
435-2		Not Sealed		Not sealed
435-3		Unsealed by Second Circuit; not filed under seal		Not sealed
435-4		Not sealed	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Not sealed
435-5		Not sealed		Not sealed
435-6		Not sealed; publicly available document		Not sealed
435-7		Not sealed		Not sealed
435-8		Not sealed		Not sealed
435-9		Not sealed		Not sealed
435-10		Not sealed		Not sealed
436	9.15.16	No position		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
444	9.26.16	Not sealed		Not sealed
447	9.28.16	No position		
370	8.12.16	Keep sealed – Non-Party reliance on Protective Order	CI-1, CI-2, CI- 3, CI-4	
371	8.12.16	Keep sealed – Non-Party reliance on Protective Order	CI-1	
371-3	8.12.16	Keep sealed – Non-Party reliance on Protective Order	CI-1	
388	8.22.16	Keep sealed – Non-Party reliance on Protective Order; release of inadmissible information in violation of Local Criminal Rule 23.1; identities of potential witnesses in criminal trial. Only redactions are names, testimony and personal identifying information of Non-Parties.	CI-1; CI-2; CI- 3; CI-4	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
389	8.22.16	Keep sealed – Non-Party reliance on Protective Order; release of inadmissible information in violation of Local Criminal Rule 23.1; identities of potential witnesses in criminal trial. Only redactions are names, testimony and personal identifying information of Non-Parties; no objection to unsealing paragraphs 5, first name in paragraph 7, and paragraph 9	CI-1; CI-2; CI- 3; CI-4	
389-1	8.22.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-2; CI-3; CI- 4; CI-5; CI-6; CI-7	Court previously ordered this Doe's transcripts to remain sealed
389-2	8.22.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1; CI-2; CI- 3; CI-4; CI-5; CI-6; CI-7	Court previously ordered this Doe's transcripts to remain sealed
389-3	8.22.16	Unsealed on Remand	CI-1; CI-2, CI- 3; CI-4; CI-5; CI-7	Unsealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
389-4	8.22.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence; Non-Party Notice sent to this Doe was returned as undelivered.	CI-7	Court previously ordered this Doe's transcripts to remain sealed
389-5	8.22.16	Recarey, unsealed on Remand (as redacted in DE 258); Doe - Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence; Unknown whether received the Notice.		Recarey - previously unsealed; Non-Party - sealed
389-6	8.22.16	Unsealed by Second Circuit		
389-7	8.22.16	Unsealed on remand.	Previously objected to; CI- 1, CI-2, CI-3, CI-4, CI-5, CI- 7	Unsealed
389-8	8.22.16	Keep sealed – Non-Party reliance on Protective Order	CI-1	
389-9	8.22.16	No objection to unsealing		

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
404	8.29.16	No objection to unsealing		
405	8.29.16	No objection to unsealing		
405-1	8.29.16	No objection to unsealing		
422	9.6.16	Not Sealed		Not Sealed
423	9.6.16	Not Sealed		Not Sealed
423-1	9.6.16	Redact names and identifying information of Non-Parties	CI-1	
423-2	9.6.16	No objection to unsealing		
423-3	9.6.16	No objection to unsealing. Publicly available document		
423-4	9.6.16	Redact names and identifying information of Non-Parties		
437	9.16.16	Not sealed		Not Sealed

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
468	10.14.16	Redact all names and identifying information for Ms. Maxwell and Non- Parties		
469	10.14.16	Unseal, except Paragraph 4 referencing Non- Party.		
469-1	10.14.16	Unsealed on remand	Previously objected to; CI- 1, CI-2, CI-3, CI-4, CI-5, CI- 7	Previously unsealed
469-2	10.14.16	Keep sealed – Non-Party reliance on Protective Order & Release of inadmissible information in violation of Local Criminal Rule 23.1; potential witness in criminal trial and deposition testimony potential evidence.	CI-1; CI-2; CI- 3; CI-4; CI-5; CI-7	
469-3	10.14.16	Partially unsealed on remand.	Previously objected to; CI- 1, CI-2, CI-3; CI-4, CI-5, CI- 7	Previously partially unsealed
479	10.24.16	Redact all names and identifying information for Ms. Maxwell and Non- Parties	Previously objected to; CI- 1, CI-2, CI-3	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
480	10.24.16	No objection to unsealing		
480-1	10.24.16	Redact all names and identifying information for Ms. Maxwell and Non- Parties	CI-1	
480-2	10.24.16	No position		
480-3	10.24.16	Partially unsealed on remand.	Previously objected to; CI- 1, CI-2, CI-3; CI-4, CI-5, CI- 7	Previously partially unsealed
480-4	10.24.16	Unsealed by Second Circuit		
490	10.28.16	Redact all names and identifying information for Ms. Maxwell and Non- Parties	Previously objected to; CI- 1, CI-2, CI-3	
491	10.28.16	No objection to unsealing		
491-1	10.28.16	Not sealed		Not sealed
491-2	10.28.16	No objection to unsealing		
491-3	10.28.16	Redact all names and identifying information for Ms. Maxwell and Non- Parties	Previously objected to	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
491-4	10.28.16	No position		
640	2.22.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
641	2.22.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
641-1	2.22.17	Keep Sealed pending input from Doe No. Entire briefing relates to a Non-Party Doe that has requested excerpts and Objected to Unsealing	CI-1	Already unsealed
641-2	2.22.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
655	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
656	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-1	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-2	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-3	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-4	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-5	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
656-6	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-7	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-8	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
656-9	3.2.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
700	3.15.17	Keep Sealed pending input from Doe No. Entire briefing relates to a Non-Party Doe that has requested excerpts and Objected to Unsealing	CI-1	
701	3.15.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status
701-1		Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
701-2		Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
707	3.13.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
709	3.13.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	
714	3.14.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1	

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DOC. #	DATE FILED	DEFENDANT'S POSITION	<u>C/I[1]</u>	Status		
715	3.14.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1			
715-1	3.14.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1			
715-2	3.14.17	Keep sealed pending input from Doe. Entire briefing relates to a Non-Party Doe that has requested excerpts and objected to unsealing	CI-1			
[1] Key:	[1] Key:					
CI-1 - Reasonable reliance the Protective Order by a party or non-party.						
CI-2 - Prevention of the abuse of court records and files.						
CI-3 - Annoyance, embarrassment, oppression, undue burden ("Privacy Interests").						
CI-4 - Preserving the fundamental rights of suspects or others under criminal investigation –						
including due process right to a fair trial and impartial jury unimpaired by excessive publicity. CI-5 - Improper submission of documents thereby weaponizing judicial documents.						
CI-6 - Untrustworthy, unreliable, and incorrect information.						

CI-7 - Non-Judicial Documents.