

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL,  
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

Case No. 1:18 Cr. 00204-NGG

**NOTICE OF MOTION**

**ORAL ARGUMENT REQUESTED**

**Submitted on November 16, 2018**

**PLEASE TAKE NOTICE** that the undersigned attorney, Marc Agnifilo, for the Defendant, KEITH RANIERE, will move the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, hereby moves the Court for an order granting the following relief:

1. Motion to Dismiss the Indictment (joining co-defendants Bronfman, Nancy Salzman, Kathy Russell, Allison Mack and Lauren Salzman's respective motions);
2. In the alternative, Motion for a Bill of Particulars (joining co-defendants Bronfman, Nancy Salzman, Kathy Russell, Allison Mack and Lauren Salzman's respective motions);
3. Motion for Prompt Production of Brady Materials, pursuant to Brady v. Maryland, 373 U.S. 83 (1963), and its progeny, including Giglio v. United States, 405 U.S. 150 (1972), and United States v. Bagley, 473 U.S. 667 (1985), the Fifth and Sixth Amendments to the Constitution of the United States and applicable law;
4. Motion to Obtain Testimony from Foreign Witnesses, or in the alternative, take Rule 15 Depositions pursuant to Fed. R. Crim. Proc. 15.

These motions are based on this Notice of Motion, the accompanying Affirmation of Marc Agnifilo, the accompanying Memorandum of Law in Support of Mr. Raniere's Motions, and the

above-referenced motions on which Mr. Raniere is joining. Mr. Raniere respectfully requests oral argument, which has been scheduled for January 3, 2018, on this motion.

Dated: November 16, 2018  
New York, New York

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marc S. Guffino', with a long horizontal flourish extending to the right.

Marc S. Guffino, Esq.  
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