

**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.

18 Crim. 204 (NGG)

PLEASE TAKE NOTICE, that upon the annexed Declaration of Justine A. Harris, Esq., the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, Kathy Russell, will move before the Honorable Nicholas G. Garaufis, United States District Judge for the Eastern District of New York, at the U.S. Courthouse located at 225 Cadman Plaza East, Brooklyn, New York, requesting that the Court:

- a) Dismiss the indictment pursuant to the Court's supervisory power over the grand jury, or, in the alternative, compel the production of discovery and conduct an evidentiary hearing;
- b) Grant Ms. Russell leave to make additional motions as and if they become appropriate in light of further discovery; and
- c) Grant any such other and further relief as to the Court deems just and proper.

Dated: January 9, 2019
New York, New York

SHER TREMONTE LLP

/s Justine A. Harris
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