

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA, )  
)  
v. )  
) Crim. No. 17-201 (ABJ/DAR)  
PAUL J. MANAFORT, JR. and )  
RICHARD W. GATES III, )  
)  
Defendants. )

DEFENDANT PAUL J. MANAFORT, JR.'S RESPONSE  
TO THE MINUTE ORDER DATED NOVEMBER 2, 2017

Paul J. Manafort, Jr., by and through counsel, files this response to the Minute Order dated November 2, 2017, in which the Court directed the defense to inform the Court of the nature of any pretrial motions expected to be filed. At this time, the defense anticipates that pretrial motions will be filed concerning the legal basis for and sufficiency of the charges, the suppression of evidence improperly obtained by search warrant, subpoena or otherwise (including the application of exceptions to common law privileges), as well as motions *in limine* based on discovery to be provided by the Government in preparation for trial.

Respectfully submitted,

/s/ Kevin M. Downing  
Kevin M. Downing, D.C. Bar No. 1013984  
Thomas E. Zehnle, D.C. Bar No. 415556  
815 Connecticut Avenue, N.W.  
Suite 730  
Washington, D.C. 20006  
(202) 754-1992

Dated: November 3, 2017