

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

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)
) Criminal No. 1:18-cr-00083-TSE

) Judge T. S. Ellis, III

) Trial Date: July 25, 2018
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)
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**DEFENDANT PAUL J. MANAFORT JR.'S REPLY TO THE SPECIAL
COUNSEL'S OPPOSITION TO HIS MOTION TO CONTINUE THE TRIAL**

Defendant Paul J. Manafort, Jr., by and through counsel, files this reply to the Special Counsel's opposition to his motion to continue the trial. (Dkt. 117). In its opposition, the Special Counsel goes to great lengths to describe Mr. Manafort's conditions of confinement and to contend that these have not had an adverse impact upon his preparation for trial. The Special Counsel's opposition is self-serving and inaccurate. While the opposition does not generally misrepresent the confinement conditions,¹ its cavalier dismissal of the challenges of preparing for back-to-back complex white collar criminal trials while the defendant is in custody shows a lack of concern with fairness or due process.

Moreover, the Special Counsel's opposition further demonstrates its unlimited resources. Apparently, but unsurprisingly, the Special Counsel has taken the time to assign personnel to listen

¹ In at least one respect, the description of conditions is inaccurate. With regard to alleged email work-around, the Special Counsel is wrong. While it is possible for Mr. Manafort to provide counsel with information he would like communicated, any communication is then sent by counsel in a manner that is consistent with the rules of the detention facility.

to all of the non-privileged phone calls Mr. Manafort makes from jail. Armed with personal conversations between Mr. Manafort and his family, the Special Counsel selects snippets to support its version of events. The Special Counsel does not pause to consider the reasons a detained defendant might have to make his situation sound better when speaking with concerned friends and family.

The Special Counsel complains that Mr. Manafort is seeking a “months-long adjournment” suggesting that such a delay is not warranted by the situation. According to the Special Counsel, if additional time were needed, Mr. Manafort would have sought a delay of both trials. This utterly misreads the situation. The two months between now and the District of Columbia trial date would allow sufficient time to prepare for that case and simultaneously to prepare for the Virginia matter. Such a schedule would allow the District of Columbia trial to proceed as scheduled on September 17 and the Virginia case to follow with only a short period between the two. This would require only a single continuance of the Virginia trial and it would be defendant’s first (and only) such request. The defendant viewed this request as a reasonable accommodation under the circumstances.

Dated: July 11, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of July, 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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