

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

UNITED STATES OF AMERICA)	
)	CRIMINAL NO. 1:18-CR-83
v.)	
)	Trial Date: July 31, 2018
PAUL J. MANAFORT, JR.,)	
)	The Honorable T. S. Ellis, III
)	
Defendant.)	

**GOVERNMENT’S RESPONSE TO THE
COURT’S JULY 25, 2018 ORDER**

On July 25, 2018, the Court issued an Order identifying thirty prospective jurors that should “be excused or stricken for cause based on their responses to the questionnaire.” In that same order, the Court invited the parties to file written objections if they disagree with the excusing or striking of any of those jurors.

Accordingly, pursuant to the Court’s Order, the government respectfully requests that the Court not strike for cause the following jurors at this time: Jurors 0121, 0143, and 0154. Given that each of these jurors affirmed that they would be able “decide the case fairly and impartially based solely on the evidence presented and the Court’s instructions of law,” *see* Question 25(D), the government believes any concerns the Court has as to their ability to be impartial would be best addressed during *voir dire*. *See, e.g., United States v. Lindh*, 212 F.Supp.2d 541, 548 (E.D. Va. 2002); *United States v. Higgs*, 353 F.3d 281, 307 (4th Cir. 2003); *Irvin v. Dowd*, 366 U.S. 717, 722-23 (1961).

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of July, 2018, I will cause to be filed electronically 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:

Thomas E. Zehnle (VA Bar No. 27755)
Law Office of Thomas E. Zehnle
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
tezehnle@gmail.com

Jay R. Nanavati (VA Bar No. 44391)
Kostelanetz & Fink LLP
601 New Jersey Avenue, N.W., Suite 620
Washington, D.C. 20001
jnanavati@kflaw.com

/s/
Uzo Asonye
Assistant United States Attorney
U.S. Attorney's Office
Eastern District of Virginia
2100 Jamieson Avenue
Alexandria, VA 22314
uzo.asonye@usdoj.gov
Phone: (703) 299-3700
Fax: (703) 299-3981

Attorney for the United States of America