

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 1:18-cr-00083-TSE
	)	
	)	Judge T. S. Ellis, III
PAUL J. MANAFORT, JR.,	)	
	)	Trial Date: July 25, 2018
	)	
<i>Defendant.</i>	)	
	)	

**DEFENDANT PAUL J. MANAFORT JR.'S RESPONSE TO THE  
COURT'S JULY 10, 2018 ORDER RELATING TO HIS PLACE OF DETENTION**

Defendant Paul J. Manafort, Jr., by and through counsel, files this response to the Court's July 10, 2018 Order relating to his place of detention. (Dkt. 113). Earlier today, the Court issued an order addressing some of the concerns raised by Mr. Manafort in his motion to continue the trial. (Dkt. 109). In that motion, one issue Mr. Manafort raised was the effect of his detention on the pace of trial preparation.

The Court endeavored to address some of those concerns in its July 10, 2018 Order by having Mr. Manafort relocated to the Alexandria Detention Center. However, the concerns underlying the request for a continuance, while specifically noting the substantial distance between Northern Neck Regional Jail and Alexandria, were, at bottom, aimed more at the difficulty of preparing for trial given Mr. Manafort's detention versus his prior status on pretrial release.

In light of Mr. Manafort's continuing detention and after further reflection, issues of distance and inconvenience must yield to concerns about his safety and, more importantly, the

challenges he will face in adjusting to a new place of confinement and the changing circumstances of detention two weeks before trial. With these considerations in mind, Mr. Manafort respectfully asks the Court to permit him to remain in his current place of detention.

WHEREFORE, Mr. Manafort respectfully requests that the Court rescind its order directing that he be moved and permit him to remain at the Northern Neck Regional Jail.

Dated: July 10, 2018

Respectfully submitted,

s/ Kevin M. Downing  
Kevin M. Downing (*pro hac vice*)  
Law Office of Kevin M. Downing  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 754-1992  
kevindowning@kdowninglaw.com

s/ Thomas E. Zehnle  
Thomas E. Zehnle (VSB No. 27755)  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 368-4668  
tezehnle@gmail.com

s/ Jay R. Nanavati  
Jay R. Nanavati (VSB No. 44391)  
Kostelanetz & Fink LLP  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 875-8000  
jnanavati@kflaw.com

*Counsel for Defendant Paul J. Manafort, Jr.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10<sup>th</sup> 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:

Andrew A. Weissman  
Greg D. Andres  
Uzo Asonye  
U.S. Department of Justice  
Special Counsel's Office  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 616-0800  
Email: AAW@usdoj.gov  
GDA@usdoj.gov  
UEA@usdoj.gov

s/ Jay R. Nanavati  
Jay R. Nanavati (VSB No. 44391)  
Kostelanetz & Fink LLP  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 875-8000  
jnanavati@kflaw.com

*Counsel for Defendant Paul J. Manafort, Jr.*