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VIA E-MAIL

Douglas Bacon
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Re: *U.S. v. Segal*, No. 02 CR 112, Appeal No. 13-3847

Dear Doug:

As you may know, Mr. Segal has an appeal pending with respect to the Government's claims to certain distributions made by two of the assets he obtained as part of the settlement. The issue really has nothing to do with the Trustee except that one of the reasons advanced by the Government for needing these assets was that there are a substantial number of unpaid bills. The Government was vague about the identity of those bills. I pulled the Trustee's last report to find out whether there was any indication that significant bills were owed. But that report was filed during 2011 and it is hard for me to go from that report to the present day.

Can your client tell me whether there are any significant bills due and owing from NNIB? Also, are there any bills due and owing from Mr. Segal? The 2011 report in a footnote references five litigation matters, four of which relate to whistleblowers that are apparently being handled by the Government. What does that mean? Is the Government seeking NNIB's assets to pay the whistleblowers?

Sincerely,



Edward T. Joyce

ETJ\mcc

cc: Marsha McClellan marsha.mcclelland@usdoj.gov
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