UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA)	Criminal No.: 10-225 (CKK)
v.)	PUBLIC VERSION
STEPHEN JIN-WOO KIM,)	
also known as Stephen Jin Kim,)	
also known as Stephen Kim,)	
also known as Leo Grace,)	
)	
Defendant.)	•

NOTICE OF FILING

In the Joint Status Report filed on August 31, 2012, the Parties updated the Court on their progress with respect to outstanding discovery issues. To further inform the Court, the United States hereby files with the Court all of the discovery correspondence between the Parties without the attachments, since the last such Notice of Filing [ECF Docket No. 58]. As reflected below, many of the government's discovery productions and the defense's most recent discovery letter are classified. Therefore, the correspondence so marked has been filed under seal with the Classified Information Security Officer (CISO) pursuant to the Court's CIPA Protective Order [ECF Docket No. 10]. Further, the names of third-parties have been redacted from the public filing to protect the privacy of those involved. Cf. F.R.Cr.P. 49.1.

1.	October 20, 2011	Government production (classified) [file under seal]
2.	November 14, 2011	Government production (classified) [file under seal]
3.	December 2, 2011	Government production (classified) [file under seal]
4.	January 4, 2011	Government production (classified) [file under seal]
5.	February 9, 2012	Defense letter (classified) [filed under seal]
6.	March 5, 2012	Government production (classified) [file under seal]

7.	April 12, 2012	Government production (classified) [file under seal]
8.	May 22, 2012	Government production (classified) [file under seal]
9.	June 15, 2012	Government production (unclassified)
10.	June 22, 2012	Defense letter (classified) [filed under seal]
11.	June 26, 2012	Government production (classified) [file under seal]
12.	July 16, 2012	Government production (classified) [file under seal]
13.	August 2, 2012	Government production (classified) [file under seal]
14.	August 3, 2012	Government production (unclassified)
15.	August 24, 2012	Government production (classified) [file under seal]
16.	August 28, 2012	Government's response to defense letter (classified) [file under seal]

An unredacted version of this Notice of Filing and the above-listed correspondence was served upon counsel for the defendant through the CISO, in the same form as provided to the Court under seal.

Respectfully submitted,

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By:

/s/

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/s/

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CERTIFICATE OF SERVICE

On this 31st day of August, 2012, a copy of the foregoing was served on counsel of record for the defendant via the Court's Electronic Filing System.

/s/

JONATHAN M. MALIS
Assistant United States Attorney

The October 20, 2011, Government production (classified) is filed under seal.

The November 14, 2011, Government production (classified) is filed under seal.

The December 2, 2011, Government production (classified) is filed under seal.

The January 4, 2011, Government production (classified) is filed under seal

The February 9, 2012, Defense letter (classified) is filed under seal

The March 5, 2012, Government production (classified) is filed under seal

The April 12, 2012, Government production (classified) is filed under seal

The May 22, 2012, Government production (classified) is filed under seal



U.S. Department of Justice

Ronald C. Machen Jr. United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

June 15, 2012

VIA FEDEX

Abbe D, Lowell, Esq. Chadbourne & Park 1200 New Hampshire Avenue, N. W. Washington, D.C. 20036

Re: United States v. Stephen Jin-Woo Kim, Crim. No. 10-255(CKK)

Dear Mr. Lowell,

To assist you in preparing for trial in this case, and pursuant to your request for Rule 16 discovery, enclosed please find the following items representing the Government's revised 19th production of unclassified discovery in the above-captioned matter:

- 1. Department of State Daily Press Briefings (US-0015831 to US-0015834).
- 2. Department of State Press Box Emails (US-0015835 to US-0015907).

Should you have any questions, please contact us.

Sincerely.

Sincerely,

RONALD C. MACHEN JR.

United States Attorney

G. MICHAEL HARVEY

Assistant United States Attorney

(202) 252-7810

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DEBORAH CURTIS

Trial Attorney

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Enclosures

The June 22, 2012, Defense letter (classified) is filed under seal

The June 26, 2012, Government production (classified) is filed under seal

July 16, 2012, Government production (classified) is filed under seal

The August 2, 2012, Government production (classified) is filed under seal



U.S. Department of Justice

Ronald C. Machen Jr. United States Attorney

District of Columbia

Judiciary Center 555 Fourth St., N.W. Washington, D.C. 20530

August 3, 2012

VIA HAND DELIVERY

Abbe D, Lowell, Esq. Chadbourne & Park 1200 New Hampshire Avenue, N.W. Washington, D.C. 20036

Re: United States v. Stephen Jin-Woo Kim, Crim. No. 10-255 (CKK)

Dear Mr. Lowell,

To assist you in preparing for trial in this case, and pursuant to your request for Rule 16 discovery, enclosed please find the following items representing the Government's 21th production of unclassified discovery in the above-captioned matter:

- 302, waiver form, accompanying emails (US-0015908 to US-0015917).
- 2. 302, waiver form, accompanying emails (US-0015918 to US-0015921).
- 3. **3.** 302, waiver form, accompanying emails (US-0015922 to US-0015959).

Should you have any questions, please contact us.

Sincerely,

RONALD C. MACHEN JR.

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Enclosures

The August 24, 2012, Government production (classified) is filed under seal.

The August 28, 2012, Government's response to defense letter (classified) is filed under seal.