

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
701	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
702	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
703	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
704	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
705	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
706	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
707	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
708	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
709	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
710	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
711	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
712	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
713	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
714	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
715	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
716	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
717	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
718	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
801	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
802	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
803	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Needs more explanation before finding that it is a business record
804	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
805	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
806	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
807	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
808	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
809	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
810	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
811	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (certification notes document "appears to be" a duplicate), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
812	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
813	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
814	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
815	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
816	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
817	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
818	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
819	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
820	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification (witness checked 3 of 4 legal requirements in certification), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
821	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
822	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
823	Malta	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 38 - Provisionally admissible as business record
903	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 40 - Provisionally admissible as business record
904	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 40 - Provisionally admissible as business record
905	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, not a business record, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 40 - Provisionally admissible as business record
906	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 40 - Provisionally admissible as business record
907	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 40 - Provisionally admissible as business record
908	Czech	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, not a business record, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 - Needs evidence that hotel routinely retained letters
1004	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1005	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1006	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1007	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1008	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1009	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, double hearsay (withdrawn ECF 229), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record (with police report removed)
1011	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1012	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1013	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, double hearsay, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally excluded for double hearsay; tr. 52 - reserved ruling on ancient docs pending add'l briefing
1014	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1015	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1016	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1017	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1018	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1019	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1020	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1022	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1024	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, double hearsay, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally excluded for double hearsay; tr. 52 - reserved ruling on ancient docs pending add'l briefing
1026	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 42 - Provisionally admissible as business record
1028	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record
1031	Frankfurt	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 41 - Provisionally admissible as business record

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1101	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1102	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1103	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1104	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1105	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1106	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1107	Heathrow	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 43 - Provisionally admissible as business record
1301	Japan	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, not a business record (withdrawn ECF 255), lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 47 - Provisionally admissible as business record (subject to government providing translated certificate)
1302	Japan	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 47 - Provisionally admissible as business record (subject to government providing translated certificate)

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1303	Japan	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 47 - Provisionally admissible as business record (subject to government providing translated certificate)
1403	Senegal	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, blank evidence tag, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1513	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1514	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record
1515	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record
1519	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1520	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record
1525	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1526	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1529	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1530	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record
1531	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record
1533	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1534	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1537	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1539	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1541	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]
1546	Switzerland	ECF148: 3505 [withdrawn], ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	[certified document argument withdrawn; ruling reserved on Ancient Documents and Residual Exception]

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1549	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1550	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1551	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1558	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1559	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1573	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1574	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1575	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1576	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks original certificate, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 50 - public records certs deficient and likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov

## Gov'ts Motion to Admit Foreign Records - Status after 1/12/26 ruling

No.	Series	Gov't argued basis for admission	Defense objections	Result
1577	Switzerland	ECF148: public records, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	likely not an actual public record; tr. 53 - ancient docs ruling reserved pending additional facts from gov
1579	Switzerland	ECF148: 3505, ancient docs, residual	ECF 173: inadequate certification, lacks foundational basis for ancient document and residual exceptions	1/12/26 tr. 44 - Provisionally admissible as business record