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Lawrence E. Jacobs

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January 11, 2021

Re: Notification Pursuant to Rule 1.12 of New York Rules of Professional
Conduct; In re Windstream Holdings, Inc., et al., Debtors, U.S. Bank National
Association v. Windstream Holdings, Inc. et al., 20 CV 4276 (VB) (Lead Case)

The Hon. Vincent L. Briccetti
United States District Court
Southern District of New York
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Dear Judge Briccetti:

I write to provide notice pursuant to Rule 1.12 of the New York Rules of Professional Conduct that we are screening Your Honor's former law clerk, Sarah Scheinman, from any participation in our work relating to a matter that was pending before Your Honor during her clerkship.

Ms. Scheinman was a law clerk in Your Honor's chambers from September 2019 to September 2020. She will join Davis Polk as an associate on January 11, 2021. We understand that, during her clerkship, she participated in consolidated appeals in the Windstream Holdings, Inc. bankruptcy: U.S. Bank National Association v. Windstream Holdings, Inc. et al., 20 civ 4276 (VB) (Lead Case). We do not represent a party in those appeals before Your Honor, but we represent Uniti Group, Inc. and Citibank N.A. in the underlying bankruptcy (the "Screened Matter").

We have established screening procedures to assure that there is no flow of information between Ms. Scheinman and the Davis Polk team working on the Screened Matter. All firm attorneys and legal assistants working on the Screened Matter will be instructed in writing by email that no person working on the Screened Matter should discuss or share with Ms. Scheinman any information relating to his or her work on the Screened Matter and that they must not seek any information from Ms. Scheinman. Similarly, Ms. Scheinman will be instructed in writing that she is not to share any information she may have about the Screened Matter with anyone at Davis Polk. The instructions will make clear that these restrictions apply to all forms of information sharing, including but not limited to oral discussions, writings, and emails. We will also restrict the files relating to the Screened Matter so that Ms. Scheinman will not be able to access them.



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We will send regular reminders of the establishment of this screen to all personnel working on the Screened Matter and to Ms. Scheinman.

The written screen notification will provide that violations of our screening procedures may result in sanctions.

As an associate, Ms. Scheinman will be paid a fixed salary, and will not be apportioned any of the fees from the Screened Matter. The determination of any associate bonus amount also will not be related in any way to fees from the Screened Matter.

Please let me know if Your Honor desires further information about the foregoing.

Respectfully submitted,

Lawrence E. Jacobs

Lawrence E. Jacobs

cc: All counsel by e-filing

By Electronic Filing