

From:


To:

Cc:

Subject: RE: Discovery

Date: Tue, 13 Jul 2021 21:14:32 +0000

Attachments: 2021.07.13_MDC_-_Maxwell_PASSWORD.docx; 2021.07.13_MDC_-_Maxwell_MAIN.docx

Cover letters for this drive are attached, let me know if they're okay to go out. The drive is being loaded now with the materials  linked below (thank you!) and will go out with FedEx either this evening or tomorrow morning, depending on when the drive finishes loading.

From:

Sent: Tuesday, July 13, 2021 3:30 PM

To:

Cc:

Subject: RE: Discovery

Thanks very much to you both!

From:

Sent: Tuesday, July 13, 2021 1:16 PM

To:

Cc:

Subject: RE: Discovery

The most recent productions that have gone to Maxwell at MDC – and that we have not already reproduced on a hard drive – are:

- 2021.05.21 (disc) – the Seventeenth Production, saved [here](#) (includes subpoena returns, native carved images, and images)
- 2021.06.10 (disc) – reproduction of the Seventeenth Production, above ^, after original disc was sent back to us. The original disc worked on my end, so maybe it is a problem with the larger 8GB discs we had to use?

Nevertheless, the materials to be loaded are the [Seventeenth Production](#). Thanks, team!!

From:

Sent: Tuesday, July 13, 2021 12:35 PM

To:

Cc:

Subject: Re: Discovery

I can handle, currently unpacking some stuff from trial but will look for the drive and try and load it later this afternoon. Could one of you please just let me know what discovery needs to be loaded onto it (or since which date) since I've been out of the loop for a bit?

Sent from my iPhone

On Jul 13, 2021, at 12:29 PM [REDACTED] wrote:

Hi team,

Any chance one of you would be able to track down a drive that Maxwell's lawyers dropped off yesterday for [REDACTED] please? Or if not, any chance you could point us to someone who would be able to help find the drive?

We need to get it loaded with the most recent productions that went to Maxwell on CDs.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Monday, July 12, 2021 10:57 PM
To: [REDACTED]
Cc: [REDACTED]

Subject: RE: Discovery

Hi [REDACTED]

We dropped off the drive this afternoon. It should be addressed to [REDACTED] Let me know if you have trouble finding it.

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Monday, July 12, 2021 9:55 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Discovery

[REDACTED]
Hope you are well, too, thanks.

We should have a production of additional non-testifying witness materials prepared to produce to you by the end of next week.

Did you drop off a hard drive today? If so, would you please let me know to whom it was addressed? [REDACTED] and I are both traveling this week, and our paralegals are currently either out of the office or on trial, so we'll need to get someone else to pick up and load the drive.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007

[REDACTED]

From: [REDACTED]
Sent: Friday, July 9, 2021 4:52 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Discovery

[REDACTED]

I hope you are all well. I wanted to circle back with you about two discovery issues. First, a little while back you said that you would be producing to us additional non-testifying 3500 material. When can we expect to receive that?

Second, you produced the last few productions to Ms. Maxwell on disk. Those disks are now not working. We will drop off a hard drive to you on Monday. Please reload those productions onto the hard drive and send it to Ms. Maxwell in MDC. If the additional non-testifying 3500 material is ready to be produced, please include that on the drive.

Regards,

[REDACTED]

[REDACTED]

<image001.jpg>

[REDACTED]

New York | Paris | Washington DC | London <image002.jpg>

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