

From:

To:

Cc:

Subject: RE: Letter

Date: Fri, 02 Oct 2020 13:26:21 +0000

Attachments: 2020.10.02_Maxwell_Discovery_Letter.pdf

Inline-Images: image001.jpg; image002.jpg

Received. We have been working with the MDC to get complete answers to all of the issues you raised in your prior letter. We will send you a formal written response when we can do so in a complete manner.

In the meantime, your copy of the new discovery production is ready for pickup at 1 St. Andrews. Attached please find the accompanying cover letter. We have also sent a copy of this new production to the MDC, along with replacement files of the materials your client had difficulty reviewing at the MDC.

The production of 40,000 images is still being prepared by our IT department, and we will let you know when that production is ready to load onto drives. To answer one of the questions you asked on a previous call, the FBI seized approximately 3,500 nude images and 40,000 non-nude images during the New York and Virgin Islands searches. The FBI is preparing all approximately 43,500 images to be viewable on a secure laptop that can reviewed at the MDC. The FBI expects that process will be complete and the laptop ready for transport next week. We are still waiting on permission from the BOP for an FBI agent to bring the laptop into the facility. Once we have that, we will reach out to you to schedule a meeting at the MDC.

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

From:

Sent: Thursday, October 1, 2020 11:11 PM

To:

Cc:

Subject: Letter

Please see the attached letter.

Regards,

