

From: "████████") <████████>
To: "████████ (USANYS)" <████████>, "████████")
<████████>, "████████ (USANYS)" <████████>
Cc: "████████ (USANYS)" <████████>

Subject: RE: Phone Call Follow-Up

Date: Fri, 30 Oct 2020 18:35:01 +0000

Inline-Images: image001.png

Those are the images we sent to PAE in September with a request that PAE mass bates stamp them and mark them all confidential. PAE then de-duped the images without asking us first, so they had to re-do the production. We have been waiting on those 40,000 images for more than a month.

From: █████ (USANYS) <████████>
Sent: Friday, October 30, 2020 2:30 PM
To: █████) <████████>; █████) <████████>; █████
(USANYS) <████████>
Cc: █████ (USANYS) <████████>
Subject: RE: Phone Call Follow-Up

Oh, I see. Do you know/are you able to recall when we asked them to burn the 40,000 images? Presumably at some point prior to 10/21-22?

From: █████) <████████>
Sent: Friday, October 30, 2020 2:28 PM
To: █████ (USANYS) <████████>; █████) <████████>; █████
(USANYS) <████████>
Cc: █████ (USANYS) <████████>
Subject: RE: Phone Call Follow-Up

Thanks ████. To be clear, the productions they are sending today consist of the 40,000 images, documents from the FBI Florida boxes, and documents from the FBI FOIA office. They are not sending, and have not sent, us any productions from the electronic devices.

From: █████ (USANYS) <████████>
Sent: Friday, October 30, 2020 2:24 PM
To: █████) <████████>; █████) <████████>; █████
(USANYS) <████████>
Cc: █████ (USANYS) <████████>
Subject: FW: Phone Call Follow-Up

See below for the update from PAE. The good news is that they're getting this back to us on a rolling basis, and it looks like we'll have at least some of this stuff in time to produce it by 11/9. The bad news is it does not seem like we'll have all of it by that date. It does seem like we'll have greater clarity by early next week.

I confess, I don't feel like I fully understand all of the steps in this process or why it takes as long as it does, but I'm happy to go back to ████ with additional questions if that would be helpful. I'm also happy to ask that he set up a call with us and PAE if that would be helpful. Please let us know what we can do.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 30, 2020 12:51 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: Phone Call Follow-Up

Some of the data is being sent to use today by FedEX. However, there is a ton of stuff still being processed. That stuff is still being imaged. Then it gets marked. Then copied to us. I have spoken to [REDACTED]. He thinks it is not possible to meet the November 9 date. He thinks the next step might be done on Tuesday, and then a better estimate of completion might be possible.

[REDACTED]

From: Koontz, Nicholas [US] <[REDACTED]>
Sent: Friday, October 30, 2020 12:25 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: Phone Call Follow-Up

Good Afternoon [REDACTED]:

Following up on our earlier phone conversation, a hard drive with the following productions is being sent to SDNY via FedEx with the following productions in the US v. Epstein workspace:

- 1) SDNYPROD008
- 2) SDNYPROD009
- 3) SDNYPROD010
- 4) SDNYPROD011 (Note: this is a six-part production)
- 5) SDNYPROD012
- 6) SDNYPROD013
- 7) SDNYPROD014

There are approximately 1.2 million records currently being imaged. The images will be available on Monday, November 2, 2020 at the earliest. The production of the records will begin as soon as the images are available in the workspace.

Please feel free to contact me if you have any questions.

Thanks,

Nick

Nicholas D. Koontz
Lead E-Discovery Analyst

e. [REDACTED]
[REDACTED]
Falls Church, Virginia 22043

PAE

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