

From: "██████████)" <██████████>
To: "██████████)" <██████████>
Cc: "██████████ (USANYS)" <██████████>
Subject: RE: laptop for MDC
Date: Wed, 28 Oct 2020 18:58:25 +0000

Thanks a bunch. Happy to join the call if that's useful. Sounds like we'll need an okay from MDC before █████ will put this in motion.

From: █████ <██████████>
Sent: Wednesday, October 28, 2020 2:53 PM
To: █████ <██████████>
Cc: █████ (USANYS) <██████████>
Subject: Re: laptop for MDC

████ is no longer at MDC, so █████ is our only liaison right now. I'll reach out to her.

On Oct 28, 2020, at 2:49 PM, █████ <██████████> wrote:

Or █████, not sure who you think is a better.

From: █████
Sent: Wednesday, October 28, 2020 2:49 PM
To: █████ <██████████>; █████ (USANYS) <██████████>
Subject: FW: laptop for MDC

████, are you able to discuss this with █████, or would you like me to reach out to her? Thanks.

From: █████ (USANYS) <██████████>
Sent: Wednesday, October 28, 2020 2:44 PM
To: █████ <██████████>
Subject: Re: laptop for MDC

It sure we will research one tonight and place the order tomorrow. It depends on availability and delivery. Do we have a copy of the data that goes with the drive?

Also with the ever changing policies in BOP, can you confirm that they will allow her to have a laptop. Not sure the rules at MDC.

Sent from my iPhone

On Oct 28, 2020, at 2:22 PM, █████ <██████████> wrote:

Perfect, thanks so much. How long would you estimate that will take?

From: █████ (USANYS) <██████████>
Sent: Wednesday, October 28, 2020 2:20 PM

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To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

We will spec out a laptop to purchase for this case.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, October 28, 2020 2:09 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

Thanks so much.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 28, 2020 2:06 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

Let me discuss with [REDACTED] the best options. get back to you shortly.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, October 28, 2020 1:58 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: laptop for MDC

Hi [REDACTED],

I hope you're doing well. Because of some discovery accessibility issues we're having in the Ghislaine Maxwell case, we would like to provide a clean laptop to Maxwell in MDC for discovery review purposes. The laptop need only permit review of standard files – word, pdf, .tif, .xls, etc. All other capabilities and programs can be disabled. I understand we did something similar in the Avenatti case, and we'd like to do the same here. Would that be possible? It would be a huge help to us if you could possibly prep and provide us with a laptop for this purpose.

Thanks so much—

[REDACTED]

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