

**From:** "████████ (USANYS) [Contractor]" <████████>  
**To:** "████████ (USANYS)" <████████>  
**Cc:** "████████)" <████████>, "████████)" <████████>  
"████████)" <████████>

**Subject:** RE: Time sensitive RE: US v. Maxwell, 20 Cr. 330 (AJN)

**Date:** Sat, 20 Nov 2021 21:36:45 +0000

**Attachments:** 2021.11.20\_MDC\_-\_Maxwell\_PASSWORD.pdf

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It is possible to upload the Rule 16 production except for SDNY\_GM\_02774100-SDNY\_GM\_02774104. I have uploaded it to USAfx in the same folder as the USAfx production folder shared with defense counsel earlier today (so they have access to it but you should flag that it's been added since the GX and 3500 was produced).

FedEx tracking for drive to CO: 8166 1429 9380

FedEx tracking for drive to MDC: 8166 1445 3318

FedEx tracking for pw to MDC: 8166 1445 3307

Drive for █████ is done and I'll leave for pick up on my way out momentarily.

Pw cover letter is attached if you want to send to █████ in case for some reason the pw arrives a day later like it did one other time.

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**From:** █████ (USANYS) <████████>  
**Sent:** Saturday, November 20, 2021 4:06 PM  
**To:** █████ (USANYS) [Contractor] <████████>  
**Cc:** █████ <████████>; █████ <████████>; █████  
████ <████████>  
**Subject:** Re: Time sensitive RE: US v. Maxwell, 20 Cr. 330 (AJN)

Thanks very much. When you have a chance, please send me the tracking number for Maxwell at the MDC, and for Colorado. (I think we have to send that to defense counsel). I will also let █████ know when the drive is ready for pickup, just let me know. Do you think there are materials we can share via USAfx from the discovery?

On Nov 20, 2021, at 4:02 PM, █████ (USANYS) [Contractor] <████████> wrote:

I conferred w █████ and ran to make the 4pm pick up for FedEx. One drive was sent to CO to Laura and the other to MDC w pw under separate cover. I'll load one of the drives dropped off today for █████ and leave it w the CSOs for pick up.

Sent from my iPhone

On Nov 20, 2021, at 3:59 PM, █████ (USANYS) <████████> wrote:

Hi - sorry I was tied up from 3-4 and just seeing this. Is there anything that we can share via USAfx since we can't make the 4 pm deadline? In other words, can we produce most of the production via USAfx and just tell them we can't produce materials with certain bates ranges given the size?

On Nov 20, 2021, at 3:38 PM, [REDACTED] (USANYS) [Contractor] <[REDACTED]> wrote:

Hi, I just called FedEx to confirm their last pick up time, and it is actually 4pm today since it is a weekend (I thought it was 6pm). Would it be possible for one of you to give defense counsel a call to ask if they want it sent via FedEx today? Would need to run it over to FedEx in like 10 minutes if so. So sorry for the fire drill, I thought since pick up was 6pm on the last few federal holidays it would be the same on Saturdays.

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Saturday, November 20, 2021 2:53 PM  
**To:** [REDACTED]; [REDACTED] <[REDACTED]>; Laura Menninger  
<[REDACTED]>; Jeff Pagliuca <[REDACTED]>  
**Cc:** [REDACTED) <[REDACTED]>; [REDACTED) <[REDACTED]>; [REDACTED)  
[REDACTED) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
**Subject:** US v. Maxwell, 20 Cr. 330 (AJN)

Counsel,

We have an additional discovery production ready to send to you. Attached please find the accompanying cover letter. That will be produced on a hard drive to you. In addition, a supplemental production of testifying witness and non-testifying witness material and exhibits are also ready to send to you. Attached please find the accompanying cover letter and indices. Those materials will be on the hard drive as well. We will also produce the testifying witness and non-testifying witness material and exhibits via USAfx.

Please let us know if you would like to pick up the drive today or if you would like us to FedEx it (and if so, to where). Please let us know if you would like us to send today via FedEx a hard drive with these materials to Ms. Maxwell at the MDC or bring the hard drive to court on Tuesday.

Thanks,

[REDACTED]  
[REDACTED]  
[REDACTED]  
Assistant United States Attorney  
United States Attorney's Office  
Southern District of New York

[REDACTED]  
New York, New York 10007  
Tel: [REDACTED]