

**From:**

**To:**

**Cc:**

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

**Date:** Thu, 27 Aug 2020 16:20:39 +0000

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Hi [REDACTED]

So far, actually seems to be functioning. Sorry for the false alarm, but perhaps she just figured out how to open the files she was previously having difficulty with.

If I receive any follow up about additional issues, I will let you know.

Appreciate your responsiveness and willingness to help!

[REDACTED] 8/26/2020 3:41 PM >>>

There are many different types of files on the drive; excel, pdf, tif, video, audio, etc. Consequently, it will be difficult to diagnose the issue(s) without knowing the specific files/folders that are problematic. If you would send over the particulars we will work to provide a fix.

Thanks,

[REDACTED]  
Paralegal Specialist  
U.S. Attorney's Office | SDNY  
1 St. Andrew's Plaza  
New York, NY 10007

**From:** [REDACTED]

**Sent:** Wednesday, August 26, 2020 3:23 PM

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

Hi [REDACTED]

Thanks very much for reaching out. I'm adding [REDACTED] who may be able to answer your question.

If there are particular files that Maxwell is having difficulty opening, please let us know, and we can try to figure out how to address the issue.

EFTA00023962

Thanks,

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

**From:** [REDACTED]  
**Sent:** Wednesday, August 26, 2020 2:45 PM

**Subject:** Re: delivery of hard drive to MDC for discovery production to inmate

Good afternoon,

Maxwell was provided this drive on Tuesday. Staff have reported to me that she has reported that certain files do not work. Can you advise what types of files (i.e., video/excel/etc.) are on the drive and what players or applications may be necessary to view them? I'm trying to figure out what reasons may be for issues with the material on the drive.

Thank you,

8/21/2020 9:01 PM >>>

We just sent another drive via FedEx. This drive contains all of the discovery in the case to date. The password for the drive is [REDACTED] (which we also sent in a separate letter).

Yes, these productions contain audio as well as video.

Let me know if you have any other questions. Have a good weekend.

Best,

Sent from my iPhone

On Aug 14, 2020, at 7:34 AM, [REDACTED] wrote:

Thank you for letting me know! Are you aware of whether this production contains any audio discovery?

Thank you,

EFTA00023963

8/13/2020 5:05 PM >>>

I just sent the next round of discovery via FedEx. The password for this drive is **USAO\_sdny2020!** We also sent a letter with the password in a separate envelope.

Please let us know when it arrives.

Thank you,

Madison

From: [REDACTED]

Sent: Monday, August 10, 2020 6:03 PM

[REDACTED]  
**Subject:** Re: delivery of hard drive to MDC for discovery production to inmate

That should be enough to track it down, thank you! If I have any issues, I'll let you know.

Best,

[REDACTED] 8/10/2020 5:59 PM >>>

I sent this via FedEx. When I enter the tracking number it says:

Delivered

Friday 8/07/2020 at 7:16 am

Let us know if you have any other questions.

Thanks!

[REDACTED]  
Sent from my iPhone

On Aug 10, 2020, at 5:48 PM, [REDACTED] wrote:

Good evening [REDACTED]

Just confirming - did you use FedEx, USPS, or some other carrier to send the discovery here? I have not received it yet, but it could just be that staff did not notify me a package arrived. Depending on the carrier, it could be in the warehouse or mailroom, so I just want to verify so I can find it expeditiously.

Thanks!

[REDACTED] 8/5/2020 7:13 PM >>>

That's extremely helpful, thanks so much. We'll plan to put the drive in the mail tomorrow, and of course please let us know if any issues arise.

thanks again,

[REDACTED]  
**From:** [REDACTED]

**Sent:** Wednesday, August 05, 2020 19:05

[REDACTED]  
**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

[REDACTED]  
Hard drives should be mailed to the facility to the attention of the legal department. We need to etch the drive with a number and provide an authorization memo so she can retain it. Then it will be provided to her. It can be password protected so long as you include a cover letter that contains the password for her.

Hope this helps,

EFTA00023964

We have a hard drive with loaded discovery that we need to deliver to Ghislaine Maxwell, [REDACTED] at MDC. Could you please let us know what the current protocol is for that? Also, it's our understanding that hard drives with discovery materials for inmates needs to be non-encrypted (and not have a password for access), is that also correct? We're hoping to get these materials to her tomorrow if at all possible, so we greatly appreciate your help. And I'm reachable any time at [REDACTED] if it would be helpful to discuss.

thanks,

[REDACTED]  
Assistant U.S. Attorney  
Southern District of New York  
[REDACTED]