

From: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: Upcoming Nineteenth Production

Date: Thu, 05 Aug 2021 13:28:09 +0000

Attachments: US_v_Maxwell_Discovery_Index.xlsx; 2021.08.05_Maxwell_Discovery_Letter.docx

Thank you, [REDACTED]! The below changes have been made and are reflected in the updated cover letter (attached and saved [here](#)) and the index (also attached and saved [here](#)). If the cover letter looks good to go, I can PDF it. Thanks again for reviewing!

From: [REDACTED] >

Sent: Wednesday, August 4, 2021 9:39 PM

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

[REDACTED]

Subject: RE: Upcoming Nineteenth Production

Thanks so much, [REDACTED]! For the index and the cover letter, would you please break out the "FBI Recovered Metadata" into two rows that correspond with the subfolders within that folder on the share? The first row should be entitled "Files Recovered from Discs Seized from Epstein NY Residence" and the second row should be entitled "De-Designated Images from Epstein's Electronic Devices".

Also, I'd like to add the following language below the index in the cover letter, please:

"Please note that the files recovered from discs seized from Jeffrey Epstein's New York residence and the De-Designated Images from Epstein's Electronic Devices are being produced to you with html files that contain thumbnails of each image and any recovered metadata next to each thumbnail. In order to view the full size image from a particular row in the html file, click on the thumbnail, which will automatically open up the full size image from within the folder structure maintained in the folder entitled "Files." Use of these html files does not require Internet access, but does require that the file structure within the folder entitled "Files" remain unchanged.

Additionally, certain of the files that were recovered from the discs seized from Epstein's New York residence are not viewable on the FBI's system. In the interest of completeness, however, we are producing to you every file that was recovered from those discs, including those that are not openable or viewable."

From: [REDACTED] >

Sent: Wednesday, August 4, 2021 3:50 PM

To: [REDACTED] >; [REDACTED] >; [REDACTED]

[REDACTED] >

Cc: [REDACTED] >; [REDACTED]

[REDACTED] >

Subject: RE: Upcoming Nineteenth Production

Great, thank you!

The entire production has now been stamped and is ready for your review. With the exception of the FBI Recovered Metadata (which is on a hard drive; we will ask [REDACTED]/IT to make us an internal copy of the stamped version), the rest of the production is saved [here](#) on the shared. The index is also attached and saved [here](#). Finally, I attached a draft cover letter for defense counsel (also saved [here](#)). I'm happy to make any changes to the production, index, or cover letter as needed.

If it looks good to go, we can start loading the materials once the hard drives from defense arrive. Thanks so much!

[REDACTED]

From: [REDACTED]
Sent: Wednesday, August 4, 2021 3:26 PM
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Upcoming Nineteenth Production

Hi [REDACTED],

Thanks! That proposal for the stamp makes sense to me.

From: [REDACTED]
Sent: Wednesday, August 4, 2021 11:08 AM
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Upcoming Nineteenth Production

Thanks, [REDACTED]! We can definitely use the same protective order stamp for this production.

[REDACTED], please let me know what you prefer for stamping the JPMC returns. I'm happy to coordinate!

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Wednesday, August 4, 2021 9:56 AM
To: [REDACTED]; [REDACTED]; [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: RE: Upcoming Nineteenth Production

Thanks [REDACTED]!

I'm going to defer to [REDACTED] on how to stamp the JPMC returns.

My preference would be to use the same stamp we used in our most recent productions, but please let me know if that label is too long to be workable, in which case we'll figure out an alternative.

From: [REDACTED] >

Sent: Wednesday, August 4, 2021 9:53 AM

To: [REDACTED] >; [REDACTED] >; [REDACTED] >

Cc: [REDACTED] >; [REDACTED] >

Subject: Upcoming Nineteenth Production

Hi all,

Mike has finished pulling the FBI Recovered Metadata from the shared, so we will be able to stamp those materials soon. They are 217 GB in size, so we should ask defense counsel for a 500GB drive for us to load the entire Nineteenth Production onto. In the meantime, I had a couple questions regarding the remaining materials in the pending production:

1. How would you like the [JP Morgan Chase returns](#) stamped? We can give each production folder its own Bates stamp, but unfortunately we can't stamp each individual file since it's in a load file format; we would have to ask [REDACTED] to do so. I'm happy to coordinate whatever you prefer.
2. How would you like us to stamp the materials so that they comply with the correct protective order designation? We can use "SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17," as we did in the most recent 3500 production, but I wanted to confirm with you all first.

I'm happy to chat further if anything's unclear. Thanks very much, all!

[REDACTED]

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