

**From:** "[REDACTED]" >

**To:** "[REDACTED]" >, "[REDACTED]" >

**Subject:** RE: US v. Maxwell - discovery production

**Date:** Fri, 02 Oct 2020 13:08:17 +0000

**Attachments:** 2020.10.02\_MDC\_-\_Maxwell\_MAIN.pdf; 2020.10.02\_MDC\_-\_Maxwell\_PASSWORD.pdf; 2020.10.02\_Maxwell\_Discovery\_Letter.pdf

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Of course – here are all three PDFs. I'm printing now and will have these out ASAP!

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**From:** [REDACTED] >

**Sent:** Friday, October 2, 2020 9:05 AM

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

**Subject:** RE: US v. Maxwell - discovery production

Thank you! These are all good to go, please go ahead and send these out.

Also, would you please pdf them and send back to me so I can email the attorney letter to the attorneys and the MDC letters to legal counsel at the MDC?

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**From:** [REDACTED] >

**Sent:** Friday, October 2, 2020 9:01 AM

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

**Subject:** RE: US v. Maxwell - discovery production

Attached are the three letters (so sorry to make you look at a screen again, [REDACTED]!)

- "Maxwell Discovery Letter" – contains password; to be loaded on each drive and then emailed to the attorneys
- "Maxwell MAIN" – to be printed and mailed with Maxwell's drive to MDC
- "Maxwell PASSWORD" – contains password; to be mailed in a separate envelope to MDC

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**From:** [REDACTED] >

**Sent:** Friday, October 2, 2020 8:43 AM

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

**Subject:** RE: US v. Maxwell - discovery production

Thank you! What's your desk number? I just want to talk the next steps through (I'm a little fried and want to make sure I'm absorbing everything)

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**From:** [REDACTED] >

**Sent:** Friday, October 2, 2020 8:42 AM

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

**Subject:** RE: US v. Maxwell - discovery production

Great, thank you!

Both drives have finished loading; Maxwell's drive contains the Reproductions, the Fourth Production, and VLC. The attorneys' drive contains the Fourth Production and VLC (just in case). I will update the cover letter with the password for

the drives and print two copies, one for Maxwell (sent in a separate envelope) and one for the attorneys.

Do you have a specific address for Maxwell at the MDC? I can get these out by 9am, I believe – thanks so much!

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**From:** [REDACTED] >

**Sent:** Thursday, October 1, 2020 8:54 PM

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

[REDACTED] >

**Subject:** RE: US v. Maxwell - discovery production

Perfect, thank you very much! Maxwell's drive should be FedEx'd to the MDC. The drive should be in one envelope and a cover letter with the password should be sent by a different FedEx envelope. The attorneys' drive can be left for pick-up.

Fine to produce these tomorrow. Just let me know when they've finished loading.

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**From:** [REDACTED] >

**Sent:** Thursday, October 1, 2020 6:52 PM

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

**Subject:** RE: US v. Maxwell - discovery production

Hi all,

The cover letter (attached) has been updated with instructions for viewing those problem files, if you'd like to review. Maxwell's drive is still copying; when and how are these to be picked up? It likely will be pretty late tonight that her drive finishes, and then I can start on the drive for the defense.

Thanks!

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**From:** [REDACTED] >

**Sent:** Thursday, October 1, 2020 4:37 PM

**To:** [REDACTED] >

**Cc:** [REDACTED] >

**Subject:** Re: US v. Maxwell - discovery production

I'd prefer that both be encrypted, please.

On Oct 1, 2020, at 4:33 PM, [REDACTED] > wrote:

At least the one to Maxwell does. The one to defense could be unencrypted so long as it's hand delivered/picked up.

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**From:** [REDACTED] >

**Sent:** Thursday, October 1, 2020 4:29 PM

**To:** [REDACTED] >

**Cc:** [REDACTED] >

**Subject:** RE: US v. Maxwell - discovery production

It needs to be encrypted, right?

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**From:** [REDACTED] >  
**Sent:** Thursday, October 1, 2020 4:27 PM  
**To:** [REDACTED] >  
**Subject:** RE: US v. Maxwell - discovery production

My apolgoies, one more question – should Maxwell's drive be encrypted or non-encrypted (read-only)?

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**From:** [REDACTED] >  
**Sent:** Thursday, October 1, 2020 4:18 PM  
**To:** [REDACTED] >  
**Subject:** FW: US v. Maxwell - discovery production

See below—would you please pick them up?

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**From:** Christian Everdell <[CEverdell@CohenGresser.com](mailto:CEverdell@CohenGresser.com)>  
**Sent:** Thursday, October 1, 2020 4:08 PM  
**To:** [REDACTED] >  
**Cc:** Mark S. Cohen <[mcohen@CohenGresser.com](mailto:mcohen@CohenGresser.com)>; Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>; Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: US v. Maxwell - discovery production

[REDACTED] –

The drives have been delivered.

Thanks,

Chris

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**From:** [REDACTED]  
**Sent:** Thursday, October 01, 2020 3:30 PM  
**To:** Christian Everdell  
**Cc:** Mark S. Cohen; Laura Menninger; Jeff Pagliuca; [REDACTED]; [REDACTED]  
**Subject:** RE: US v. Maxwell - discovery production

Chris,

Thank you very much. That is acceptable, and I will inform our paralegals that they should pick up the drives from the CSOs and immediately begin loading the production onto the drives. We will send Ms. Maxwell's drive to the MDC as soon as it is loaded, and we will let you know when your drive is ready for pickup.

Best,

[REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
1 St. Andrew's Plaza  
New York, NY 10007  
212-637-2324  
[REDACTED]

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**From:** Christian Everdell <[CEverdell@CohenGresser.com](mailto:CEverdell@CohenGresser.com)>

**Sent:** Thursday, October 1, 2020 3:28 PM

**To:** [REDACTED]

**Cc:** Mark S. Cohen <[mcohen@CohenGresser.com](mailto:mcohen@CohenGresser.com)>; Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>; Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: US v. Maxwell - discovery production

[REDACTED] –

Tom Powers from our office will be coming by 1 St. Andrew's within the hour to deliver two hard drives for these productions – one for us and one for Ms. Maxwell in the MDC. He will leave them with the CSOs with an indication that they should be delivered to you. Please confirm that this is acceptable.

We strongly request that you deliver the drive to Ms. Maxwell tomorrow that she is able to use the weekend to begin reviewing the discovery.

Thanks,

Chris

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**From:** [REDACTED]

**Sent:** Thursday, October 01, 2020 1:18 PM

**To:** Christian Everdell

**Cc:** Mark S. Cohen; Laura Menninger; Jeff Pagliuca; [REDACTED]; [REDACTED]

**Subject:** US v. Maxwell - discovery production

Chris,

Our office has prepared replacement files for the documents Ms. Maxwell has been unable to open at the MDC. Additionally, we have prepared a new discovery production, which is ready for production both to you and to Ms. Maxwell at the MDC. In order to produce these, we will need two hard drives – one for production to you and one for production to the MDC. Would you please provide us with drives to load? For the MDC production, please let us know if you would like us to ask the MDC to send us one of the drives that we previously sent to your client for us to load with the new materials.

Best,

[REDACTED]

[REDACTED]

Assistant United States Attorney

Southern District of New York

1 St. Andrew's Plaza

New York, NY 10007

[REDACTED]

[REDACTED]