

**From:** "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>

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

**Subject:** RE: PAE drive copy

**Date:** Tue, 17 Nov 2020 19:43:53 +0000

**Attachments:** 2020.11.18\_Maxwell\_Discovery\_Letter.docx

Hi [REDACTED]!

The two drives from PAE are encrypted, so I can't edit them myself and add the iPhone from the shared. I think it will be fairly easy and quick for me to burn two password-protected discs containing the iPhone images, so if you are okay with me doing so, I'll get started on that. If we produce the PAE drive and the password-protected disc, I'll change the language in the cover letter (defense's is attached) to reflect that.

Below is the chart detailing the Seventh Production, both for your review:

Production 7 (November 18, 2020)			
Bates Start	Bates End	Summary Description	Confidential Designation
SDNY_GM_00536837	SDNY_GM_00869725	SDNY_PROD015 - PART 01 (Search Warrant Returns)	Confidential
SDNY_GM_00869726	SDNY_GM_01216165	SDNY_PROD015 - PART 02 (Search Warrant Returns)	Confidential
SDNY_GM_01216166	SDNY_GM_01546512	SDNY_PROD015 - PART 03 (Search Warrant Returns)	Confidential
SDNY_GM_01546513	SDNY_GM_01964992	SDNY_PROD015 - PART 04 (Search Warrant Returns)	Confidential
SDNY_GM_01964993	SDNY_GM_02292245	SDNY_PROD015 - PART 05 (Search Warrant Returns)	Confidential
SDNY_GM_02292246	SDNY_GM_02678243	SDNY_PROD015 - PART 06 (Search Warrant Returns)	Confidential
SDNY_GM_02678244	SDNY_GM_02735320	SDNY_PROD015 - PART 07 (Search Warrant Returns)	Confidential
SDNY_GM_02735321	SDNY_GM_02742042	SDNY_PROD016 (Search Warrant Returns)	Confidential
SDNY_GM_02742043	SDNY_GM_02742043	NYC024318 1B71 (iPhone, images pt. 2)	Confidential

Thanks so much!

**From:** [REDACTED] <[REDACTED]>

**Sent:** Tuesday, November 17, 2020 2:00 PM

**To:** [REDACTED] (USANYS) [Contractor] <[REDACTED]>

**Subject:** RE: PAE drive copy

Please give it a new bates stamp, thanks!

**From:** [REDACTED] (USANYS) [Contractor] <[REDACTED]>

**Sent:** Tuesday, November 17, 2020 1:59 PM

**To:** [REDACTED] <[REDACTED]>

**Subject:** RE: PAE drive copy

I was just emailing you about this, actually! Would you like the iPhone folder renamed with the same bates stamp it had before (SDNY\_GM\_SUPP\_00219449), or do you want it to have a new bates stamp, as it contains new information? Thanks!

**From:** [REDACTED] <[REDACTED]>

**Sent:** Tuesday, November 17, 2020 1:58 PM

To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Subject: RE: PAE drive copy

Would you please also work on getting the final report with images ready for production? It's saved here:

\\[REDACTED]  
[REDACTED] \NYC024318 1B71 (iPhone)

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From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Sent: Tuesday, November 17, 2020 1:43 PM  
To: [REDACTED] <[REDACTED]>  
Subject: RE: PAE drive copy

Absolutely! I'll tell him now, and I'll put together a cover letter for defense for your review.

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From: [REDACTED] <[REDACTED]>  
Sent: Tuesday, November 17, 2020 1:40 PM  
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Subject: RE: PAE drive copy

Thanks [REDACTED]!

I'd like to get the defense drive out the same day as the defendant's drive. PAE is going to make us another copy for us to keep at 1SA. So please tell [REDACTED] that he can stop copying the defense drive.

Would you please put together a cover letter for the defense for this production?

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From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Sent: Tuesday, November 17, 2020 12:35 PM  
To: [REDACTED] <[REDACTED]>  
Subject: RE: PAE drive copy

Hi [REDACTED],

As an update, the PAE drive that will be delivered to Maxwell is ready to go at my desk. The password is WO-6290\_20201104 and, if needed, I can prepare a cover letter containing the password to be included separately from the drive.

I've given the other PAE drive to [REDACTED] to start making an internal copy for us. Given the large size of data and massive amount of individual file paths on that drive, he estimates it will take a couple days to make the copy. If a delay in getting the drive to defense is an issue, we can connect with [REDACTED] and see if there is another solution.

Thanks so much! Happy to chat more about this if needed too,

[REDACTED]

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From: [REDACTED] (USANYS) [Contractor]  
Sent: Tuesday, November 17, 2020 11:38 AM  
To: [REDACTED] <[REDACTED]>  
Subject: PAE drive copy

Hi [REDACTED]!

This is not time sensitive, so no rush on this at all, but I was going to have [REDACTED] make a copy of the PAE drives for us at some point this week. When you have a moment, please let me know if you're not using one of the drives and (if it's here in the office) I'll give the drive to [REDACTED] to copy for our internal use.

Thanks so much!

[REDACTED]

Paralegal Specialist

U.S. Attorney's Office | SDNY

1 St. Andrew's Plaza

New York, NY 10007

Office: [REDACTED]

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