

**From:** "[REDACTED]" <[REDACTED]>  
**To:** Christian Everdell [REDACTED], Laura Menninger [REDACTED], Jeff Pagliuca [REDACTED], "BOBBI C STERNHEIM" [REDACTED]  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" (USANYS) <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** RE: Maxwell - Verdict form and proposed stips  
**Date:** Sat, 13 Nov 2021 17:15:37 +0000  
**Attachments:** GX\_1007 - CA depo (2021.11.13\_version).pdf; GX\_1008 - GM depo (2021.11.13\_version).pdf; GX\_1006 - DA depo (2021.11.13\_version).pdf

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Hey Chris,

Apologies for the mistake about your name. Attached are corrected versions of those three stips.

We understand that you need more time to consider stippling to the authenticity of the birth certificates and [REDACTED] statement, but we do think we need either a stip or decision that they are self-authenticating quickly. We're planning to raise the issue with Judge Nathan on Monday so we can seek a briefing schedule. If you end up with a decision by then, please just let us know.

Thanks,  
[REDACTED]

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Friday, November 12, 2021 9:49 PM  
**To:** [REDACTED] <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; "BOBBI C STERNHEIM" <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** [EXTERNAL] RE: Maxwell - Verdict form and proposed stips

[REDACTED] -

[Circling back to you from our conversation earlier today. We are prepared to stipulate to the authenticity of the three depositions \(CA, DA and GM\). Please send me revised stips that correct my name to "Christian Everdell" from "Christopher Everdell" and I will sign them and return them to you.](#)

[At this time, we are not prepared to stipulate to the authenticity of the \[REDACTED\] statement or the birth certificates. We are not saying that we will never stip to these documents. We just need time to consider this issue as a team and your position re: self-authentication. We don't think it is necessary for you to brief this issue, but obviously it is your decision to do so if you feel you must because of witness travel, etc.](#)

Thanks,

Chris

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, November 8, 2021 6:32 PM  
**To:** Christian Everdell [REDACTED]; Laura Menninger [REDACTED]; Jeff Pagliuca [REDACTED]; "BOBBI C STERNHEIM" <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]  
[REDACTED] <[REDACTED]>

**Subject:** RE: Maxwell - Verdict form and proposed stips

Counsel,

Attached is a second set of proposed stips. Please let us know in advance of Wednesday's conference whether you are willing to sign these and the ones we sent you previously, so we can seek a briefing schedule on the exhibits that are self-authenticating if necessary.

Thanks,

[REDACTED]

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**From:** [REDACTED]

**Sent:** Friday, October 29, 2021 10:19 PM

**To:** Christian Everdell <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca

<[REDACTED]>; 'BOBBI C STERNHEIM' <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>; Lara E. Pomerantz ([REDACTED])

<[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** Maxwell - Verdict form and proposed stips

Counsel,

Although we've sent you our draft joint proposed request to charge, we haven't send you a verdict sheet. One is attached here.

We've also attached four proposed stips. Please return them to us by a week from today – November 5 – so we know whether to begin preparing records custodians. We also anticipate sending you a few additional steps.

Thanks,

[REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
1 Saint Andrews Plaza  
New York, New York 10007

[REDACTED]

[REDACTED]