

**From:** "[REDACTED]" <[REDACTED]>  
**To:** Sigrid McCawley <[REDACTED]>, Sandra Perkins <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, Peter Skinner <[REDACTED]>  
**Subject:** RE: legal process, regarding In re [REDACTED] v. Maxwell, 15 Civ. 7433  
**Date:** Mon, 22 Apr 2019 21:04:32 +0000  
**Importance:** Normal

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Sigrid,

Totally understand, and we appreciate the information. We've received both productions, as well as an initial index, and we're happy to talk further about what if anything would be additionally useful.

As a threshold question, following the productions from Thursday and Friday, do you expect to make any further production(s), or are they fully or substantially complete? I ask just so we can manage our upload and transmittal processes here.

And it would be great to talk with you about the materials, thank you – we wanted to peruse them for a couple days initially, but it obviously is a large volume and so I think it would make sense to chat at your convenience. Is there a time tomorrow that would work for you? We're available anytime except 11-12 and 2-3, if there's a slot that works, or can also figure out a time for later in the week if that's preferable, no problem.

thanks very much,  
[REDACTED]

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**From:** Sigrid McCawley <[REDACTED]>  
**Sent:** Friday, April 19, 2019 09:47  
**To:** [REDACTED] <[REDACTED]>; Sandra Perkins <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; Peter Skinner <[REDACTED]>  
**Subject:** RE: legal process, regarding In re [REDACTED] v. Maxwell, 15 Civ. 7433

Hello [REDACTED],

We can provide you with a separate index but our first priority today is rolling more documents out to you. If you would prefer we switch our focus to an index we can do that but I would not that each of the files outlines what the document is when you click on it. If I can get an extra staff member to work on an index while Sandy works on loading more into the production I will do so.

If you want to have a call I can also direct you through some of the materials. For example there are some experts we had in our case that related solely to the defamation claims so they will not necessarily be of interest to you – whereas there are other people who we considered to be key witnesses. I'm around today if you would like to speak.

Let me know how you would like to handle.  
Thanks,  
Sigrid

**Sigrid McCawley**  
Partner

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**BOIES SCHILLER FLEXNER LLP**

EFTA00040510

401 E. Las Olas Blvd. Suite 1200  
Fort Lauderdale, FL, 33301

[www.bsfilp.com](http://www.bsfilp.com)

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**From:** [REDACTED] ([mailto:\[REDACTED\]](mailto:[REDACTED]))  
**Sent:** Friday, April 19, 2019 12:12 AM  
**To:** Sandra Perkins <[REDACTED]>  
**Cc:** Sigrid McCawley <[REDACTED]>; [REDACTED] <[REDACTED]>; Peter Skinner <[REDACTED]>  
**Subject:** RE: legal process, regarding In re [REDACTED] v. Maxwell, 15 Civ. 7433

Sandra,

We've received the materials and were able to download them, thanks very much. We were also wondering—and this may be a question for Peter and/or Sigrid—whether, similar to the prior production, we might be able to get an index of the materials?

thanks again,

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**From:** Sandra Perkins <[REDACTED]>  
**Sent:** Thursday, April 18, 2019 17:01  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Sigrid McCawley <[REDACTED]>; [REDACTED] <[REDACTED]>; Peter Skinner <[REDACTED]>  
**Subject:** RE: legal process, regarding In re [REDACTED] v. Maxwell, 15 Civ. 7433

Mr. Rossmiller,

On behalf of attorney, Peter Skinner, please see the attached correspondence. In addition, I will be transmitting a secured link to related materials via our BSF ShareFile system. Please feel free to contact me should you have any difficulty accessing the materials.

**Sandra Perkins**  
Case Manager

**BOIES SCHILLER FLEXNER LLP**

401 E. Las Olas Blvd. Suite 1200  
Fort Lauderdale, FL, 33301

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**From:** [REDACTED] ([mailto:\[REDACTED\]](mailto:[REDACTED]))  
**Sent:** Monday, April 15, 2019 7:49 PM  
**To:** Peter Skinner <[REDACTED]>  
**Cc:** Sigrid McCawley <[REDACTED]>; Sandra Perkins <[REDACTED]>  
<[REDACTED]>  
**Subject:** RE: legal process, regarding In re Guiffre v. Maxwell, 15 Civ. 7433

EFTA00040511

Mr. Skinner,

In connection with the grand jury subpoena (the "Subpoena") directed to Boies Schiller Flexner LLP ("BSF"), in connection with the case captioned [REDACTED] v. *Maxwell*, 15 Civ. 7433 (RWS), in the Southern District of New York, served on February 5, 2019, attached please find a sealed order (the "Order") granting permission to BSF to comply with the Subpoena through the production of discovery materials marked "CONFIDENTIAL" pursuant to the protective order in that case. Please note that although the Order permits the provision of a copy to BSF, it is otherwise sealed. A copy of the Subpoena is also attached for your convenience.

I also note in particular that the Order applies only to the above-captioned litigation, and not to any other litigation including but not limited to *In re Jane Doe 43 v. Epstein, et al.*, 17 Civ. 0616. Please produce only materials in connection with the case to which the Order applies.

Please let me know if you have any additional questions regarding the Order, or if it would be useful to discuss production methods and/or schedule.

thank you,  
Alex.

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

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