

**From:** "[REDACTED]" <[REDACTED]>  
**To:** Christian Everdell <[REDACTED]>, "Mark S. Cohen"  
<[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]"  
<[REDACTED]>

**Subject:** RE: Hard Drive and Discovery

**Date:** Thu, 06 Aug 2020 01:24:54 +0000

**Attachments:** 2020.08.05\_Maxwell\_Discovery\_Letter\_(corrected).pdf; SDNY\_GM\_00000834-SDNY\_GM\_00000905.zip

**Inline-Images:** image001.png; image002.jpg

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Counsel,

In the discovery materials provided this afternoon, one category of materials, totaling ten individual documents, was inadvertently produced without "Confidential" stamps and designations. Those materials were stamped with Bates identifiers SDNY\_GM\_00000834 through SDNY\_GM\_00000962, and were described in the cover letter as the categories (and included in folders on the hard drive titled) "Unsealing materials pertaining to 15 Civ. 7433 (RWS), 19 Misc. 149 (CM)" and "Unsealing materials pertaining to 17 Civ. 0616 (SN), 19 Misc. 179 (SN)."

Attached please find an updated cover letter, the only change to which as compared to the letter provided with the materials earlier today is the corrected designation of those materials as "Confidential." Also attached please find a .zip folder containing copies of the materials in the first above-described folder, correctly marked as "Confidential," totaling six documents. Due to the combined size of all ten relevant files, we will provide in a separate email a .zip folder with the four documents contained in the latter above-described folder.

Please delete the versions of these documents inadvertently produced without confidential designations, and please advise any defense staff, other authorized persons, or any other individuals who may have received copies of the discovery today that they should similarly delete any copies of old versions of the documents and replace them with the corrected versions. Please also confirm that you have received this update.

Regards,

[REDACTED]

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, August 05, 2020 14:10  
**To:** Christian Everdell <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: Hard Drive and Discovery

Chris,

Our paralegal has informed us that the discovery production is downstairs at [REDACTED] and available for pick-up. The envelope is addressed to you and Mark, in case the person picking it up has any issues. The password to the drive is: [REDACTED]

We are working on a second production and hope to have that ready next week, so please return the drive (or provide a new one) when you are able, so that we can load the next round of materials.

EFTA00040590

Thanks,

[REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York

[REDACTED]

[REDACTED]

[REDACTED]

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

**Sent:** Monday, August 3, 2020 6:26 PM

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

**Cc:** Mark S. Cohen <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: Hard Drive and Discovery

Chris,

We have received the 2TB hard drive that was delivered on Friday, and although I have not personally received the hard drive dropped off today, I imagine it is en route to me via the Office's mail delivery process. I will let you know if for some reason I have not personally received it by the close of business tomorrow.

With respect to our first discovery production, we currently are in the process of stamping and then uploading it to your hard drive. As I noted in my email on Friday, we expect that process should not take more than approximately two business days, and we will let you know immediately when it is ready for pickup.

Regards,

[REDACTED].

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

**Sent:** Monday, August 03, 2020 14:33

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

**Cc:** Mark S. Cohen <[REDACTED]>

**Subject:** Hard Drive and Discovery

[REDACTED] -

On Friday, you should have received a 2TB hard drive, which we dropped off by hand at [REDACTED]. Please use it to load the discovery. We will send someone to [REDACTED] to pick up the hard drive at the close of business tomorrow.

We also dropped off another 2TB hard drive this morning. That is for our client's copy of the production in MDC.

Please confirm receipt of both hard drives.

Regards,

Chris

EFTA00040591

Christian Everdell

COHEN & GRESSER LLP

[REDACTED]  
[REDACTED]  
[REDACTED] | [view bio](#)  
[REDACTED]

New York | Seoul | Paris | Washington DC | London



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