

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

**Subject:** FW: Letter re: Discovery

**Date:** Thu, 27 Aug 2020 22:09:28 +0000

**Attachments:** 2020.08.27\_Letter\_to\_Government\_re\_Unreadable\_Discovery.PDF

**Inline-Images:** image001.png; image004.jpg

[REDACTED]

As you go through and shorten the file names for the Maxwell discovery, please make sure to address the files listed in the attached letter from defense counsel.

I'll let you know when I receive the drives they are sending. I expect we will ask IT to load the drive with on-board encryption with the full set of discovery from all three productions to date once you have shortened the file names. I expect we will use the other drive to load the reproduction of the LSJ folder.

As always, please let me know if any of this doesn't make sense or if there are any issues, and thank you so much for all of your help.

Thanks,

[REDACTED]

---

**From:** Christian Everdell [REDACTED]  
**Sent:** Thursday, August 27, 2020 5:00 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
(USANYS) <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]> 'Laura Menninger' <[REDACTED]>; Jeff Pagliuca <[REDACTED]>  
**Subject:** Letter re: Discovery

[REDACTED] -

Thank you for the call regarding Ms. Maxwell's discovery at the MDC. As I mentioned on the call, attached is a letter detailing the problems with the discovery and the files that she cannot open.

Today, we will be shipping to [REDACTED] attention two new hard drives – one with on-board encryption and one without. Please use one of them to load a new version of the entire production set so far, with the shortened file paths. Please provide the loaded drive to Ms. Maxwell at the MDC as soon as possible. Our preference would be for you to use the drive with on-board encryption so that you do not have to use the McAfee encryption that you have been using, as long as it does not substantially increase the time it will take to load the drive. As we discussed, you will give me an estimate of the time it will take to do that. Once you have selected the drive, please notify us and we will pick up the other one.

Also, as we discussed, we request that you produce to Cohen & Gresser replacement copies of the documents in the "LSJ" subfolder of the "Search warrant photos" folder in the most recent production, as we are having trouble viewing them. Please let me know if you have any questions.

Regards,

Chris

Christian Everdell

## COHEN & GRESSER LLP

800 Third Avenue  
New York, NY 10022

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

New York | Seoul | Paris | Washington DC | London



*CONFIDENTIALITY NOTICE: The information contained in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed initially by only the individual named above. If the reader of this e-mail is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by telephone and permanently delete this e-mail. Thank you.*

*PRIVACY: A complete copy of our privacy policy can be viewed at: <https://www.cohengresser.com/privacy-policy>.*