From: Christian Everdell <CEverdell@CohenGresser.com>
To: "[redacted])'" <[redacted]>, "[redacted])" <[redacted]>, "[redacted] (USANYS)" <[redacted]>
Cc: "Mark S. Cohen" <mcohen@CohenGresser.com>, 'Laura Menninger' <lmenninger@hmflaw.com>, Jeff Pagliuca <jpagliuca@hmflaw.com>
Subject: Letter re: Discovery
Date: Thu, 27 Aug 2020 20:59:45 +0000
Attachments: 2020.08.27_Letter_to_Government_re_Unreadable_Discovery.PDF
Inline-Images: image001.png; image004.jpg

[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

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