

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

Subject: RE: FW: DOJ Visit and Discovery

Date: Tue, 08 Sep 2020 23:01:06 +0000

Attachments: 2020.09.03_MDC_-_Maxwell_PASSWORD_(003).pdf; 2020.09.03_MDC_-_Maxwell_MAIN_(003).pdf

Inline-Images: image001.png; image002.jpg

Thanks very much [REDACTED] Really appreciate the quick response. Please let us know if you learn of any planned visit from DOJ. Our office is not aware of any planned visit either.

And apologies for the oversight, we must have forgotten to email you about the drive. Our paralegal sent a new drive out for Maxwell on Thursday, September 3rd. Attached are the two accompanying letters. Would you please look into its status for us?

Thanks again,
[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: Holly Pratesi <[REDACTED]>
Sent: Tuesday, September 8, 2020 6:44 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: FW: DOJ Visit and Discovery

Good evening [REDACTED],

I am unaware of any visit tomorrow by DOJ representatives. I will raise this early tomorrow with staff and see if I can get any further details about this.

When was the drive sent last week? We have received two drives to date - are you saying another was sent? I do not recall seeing any emails about a third set (if I missed it while out of the office, I apologize).

Thanks,
[REDACTED]

>>> "[REDACTED]" <[REDACTED]> 9/8/2020 6:41 PM >>>
[REDACTED]

We just received the below email from Ghislaine Maxwell's attorney. Do you know what DOJ representatives they are referring to? Regardless, per counsel's instruction below, please ensure that no DOJ representatives speak with Maxwell without her counsel present.

Also, would you please check on the status of the drive our office sent out last week?

I can be reached on my cellphone at [REDACTED] and am happy to have a call if that would be useful.

Thank you,

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: Christian Everdell <[REDACTED]>

Sent: Tuesday, September 8, 2020 6:37 PM

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

Cc: Mark S. Cohen <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>

Subject: DOJ Visit and Discovery

[REDACTED], [REDACTED] -

I hope you had a good Labor Day weekend. Our client has advised us that representatives from the DOJ will be meeting with her in the MDC tomorrow. We are not clear who these representatives are or what they intend to meet with our client about. But it goes without saying that she is a represented party and that no representatives from DOJ should be speaking with her without her counsel present. We request that you notify the appropriate people at MDC about this as soon as possible.

Also, our client has still not received the replacement hard drive you sent out on Thursday, September 3, at our request. As a result, it is now over two weeks past the August 21 deadline for completion of the initial tranche of discovery and Ms. Maxwell is still unable to review a substantial portion of the discovery produced to date. Ms. Maxwell cannot participate in her defense if she cannot review the discovery. Accordingly, we request that you expedite the delivery of the hard drive.

Regards,

Chris

Christian Everdell

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