

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

**Subject:** FW: DOJ Visit and Discovery  
**Date:** Tue, 08 Sep 2020 22:41:33 +0000  
**Inline-Images:** image001.png; image003.jpg

[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]

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

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**From:** Christian Everdell <[REDACTED]>  
**Sent:** Tuesday, September 8, 2020 6:37 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]> (USANYS) <[REDACTED]>  
**Cc:** Mark S. Cohen <[REDACTED]>; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>  
**Subject:** DOJ Visit and Discovery

[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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