

From: "██████████ (██████████) [Contractor]" <██████████>
To: "██████████ (██████████)" <██████████>, "██████████ (██████████) [Contractor]" <██████████>
Cc: "██████████ (██████████)" <██████████>, "██████████ (██████████)" <██████████>, "██████████ (██████████) [Contractor]" <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production
Date: Wed, 04 Nov 2020 18:17:32 +0000

We will work on exporting the data from the database. I will let you know when this has been completed.

Thank you.

██████████.

From: ██████████ (██████████) <██████████>
Sent: Wednesday, November 4, 2020 12:25 PM
To: ██████████ (██████████) [Contractor] <██████████>; ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████ (██████████) <██████████>; ██████████ (██████████) <██████████>; ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

Looks good. Thanks.

From: ██████████ (██████████) [Contractor] <██████████>
Sent: Tuesday, November 3, 2020 1:31 PM
To: ██████████ (██████████) <██████████>; ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████ (██████████) <██████████>; ██████████ (██████████) <██████████>; ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

Good afternoon,

The production has been completed and a search for the production can be found below. Please review and let me know if there are any issues with the production. If there are no issues with the production I will begin the process of exporting the data from Relativity.

SDNY_PROD001 - <https://d1pe.nss.pae.com/Relativity/go?id=2045541-2180390>

Thank you.

██████████.

From: ██████████ (██████████) <██████████>
Sent: Friday, October 30, 2020 6:34 PM
To: ██████████ (██████████) [Contractor] <██████████>; ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████ (██████████) <██████████>; ██████████ (██████████) <██████████>; ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

On the discovery production, it'd be great if we could have the bates ranges by November 8 – two days earlier. We've got a court conference on November 9, and while it sounds like it won't be able to produce the discovery by November 9, it'd be helpful to be able to tell them the volume with a promise we'll produce later that week.

Thanks,

From: [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Friday, October 30, 2020 10:31 AM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

You can go ahead and tag more documents to produce as it will not mess with the production we are currently working on right now.

As of right now the vendor is currently working 15 different productions and the Epstein production is currently taking up a lot resources right now due to their pending discovery deadline. I hope to have your production ready by November 10th as we are currently working on the imaging of your documents. Please let me know if there are any questions.

Thank you.

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Friday, October 30, 2020 10:22 AM
To: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hi [REDACTED] – Two questions for you: first, any update on the timing of this production? Second, there are some more documents in the same folders that I want to tag "identified" and produce. I just want to confirm you'll be able to identify those and produce them when they're tagged, and that it won't screw with this pending production.

Thanks,

From: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Friday, October 23, 2020 10:10 AM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Great. We will start on the imaging and bates stamping of the documents. I will let you know if there are any other questions regarding this production.

Thank you.

██████████.

From: ██████████, ██████████ (██████████) <██████████>
Sent: Friday, October 23, 2020 9:59 AM
To: ██████████, ██████████ (██████████) [Contractor] <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hi ██████████,

This looks correct. The numbers match up.

Thanks,

██████████

From: ██████████, ██████████ (██████████) [Contractor] <██████████>
Sent: Friday, October 23, 2020 9:40 AM
To: ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hello

Can you please review the production search again as I believe that I found all of the documents but I want to make sure that everything is here.

<https://d1pe.nss.pae.com/Relativity/go?id=2045541-2000599>

Thank you.

██████████.

From: ██████████, ██████████ (██████████) <██████████>
Sent: Wednesday, October 21, 2020 2:28 PM
To: ██████████, ██████████ (██████████) [Contractor] <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Cc: ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) <██████████>; ██████████, ██████████ (██████████) [Contractor] <██████████>
Subject: RE: We Build the Wall Relativity - Discovery Production

Ok, the following folder paths were not completely copied:

Search Warrant Returns\2020.01.02 Warrant (20 Mag. 0053)\Google = approximately 23,000 emails missing.

Please correct the error and let us know when it is ready and we'll re-review. There should be a total of 89,766 items in the production folder, so if that figure is off there's an error.

From: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Wednesday, October 21, 2020 2:02 PM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

I had a field named Relativity Folder Path put in the search so you can filter by this field to see which documents are part of the production. Please let me know if there are any questions?

Thank you.

[REDACTED]

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Wednesday, October 21, 2020 12:25 PM
To: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hi [REDACTED],

With the search I'm seeing 66,215 items, but when I filter down in the general database to "Identified Responsive" I'm getting 89,766 items, so it looks like the saved search didn't capture everything. Is it possible to see each of the folders the production is being pulled from and the email count per folder that's being produced?

[REDACTED]

From: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Wednesday, October 21, 2020 9:35 AM
To: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Good Morning,

I want to make sure that we have all of the documents you wish to produce. Can you please review the below search and let me know that everything you requested to be produced is in the below search:

In Re We Build The Wall - DRAFT SDNY_PROD001 - <https://d1pe.nss.pae.com/Relativity/go?id=2045541-2000599>

Thank you.

[REDACTED]

From: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Friday, October 16, 2020 9:17 AM
To: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hey [REDACTED],

Would please have the bates numbers start at **SDNY_00273293**.

Thanks,

[REDACTED]

From: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Sent: Friday, October 16, 2020 9:12 AM
To: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: RE: We Build the Wall Relativity - Discovery Production

Hello,

Can you please let me know if any of these documents will require a confidential stamp?

Thank you.

[REDACTED]

From: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>
Sent: Thursday, October 15, 2020 11:55 PM
To: [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] ([REDACTED]) [Contractor] <[REDACTED]>
Subject: We Build the Wall Relativity - Discovery Production

Hi [REDACTED],

For the We Build the Wall Relativity database, we'd like to produce all of the documents marked "Identified Responsive" from the follow folders:

Search Warrant Returns > 2020.01.02 Warrant (20 Mag. 0053) (all subfolders)
Search Warrant Returns > 2020.07.06 Warrant (20 Mag. 7063) > Google
Search Warrant Returns > 2020.07.06 Warrant (20 Mag. 7063) > Microsoft
Search Warrant Returns > 2020.07.06 Warrant (20 Mag. 7063) > Oath
Search Warrant Returns > 2020.07.13 Warrant [all subfolders]

[REDACTED] or [REDACTED] will give you the bates number to start with. We'd like to produce this with a load file. Can you give us the bates ranges for each of the above folder?

Please don't include anything marked as potentially privileged that's currently restricted from us.

Let me know if you have any questions.

██████ ██████
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007

