

Please let me know how you would like to proceed. I will reach back out once I have answers to your questions.

Thank you,

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

From: [REDACTED]
Sent: Tuesday, March 9, 2021 4:56 PM
To: Laura Menninger <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

That is the only excel spreadsheet indexing physical evidence that we have produced in discovery. That spreadsheet does not include every physical item currently in the FBI's custody related to this case. For example, the August 20, 2020 discovery production also included search warrant returns listing the physical items seized by the FBI's New York Office during the 2019 searches of Jeffrey Epstein's residences in New York and the U.S Virgin Islands (see Bates range SDNY_GM_00166007-SDNY_GM_00166043), but they are not contained in a spreadsheet.

As a courtesy, I have asked the FBI whether it would be possible to provide us with a similar excel index reflecting the physical evidence seized by the FBI's New York Office, though it may take some time to compile such an index.

Best,

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

From: Laura Menninger <lmenninger@hmflaw.com>
Sent: Tuesday, March 9, 2021 3:44 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Thank you. Is that the only index of physical evidence available?

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, March 9, 2021 1:38 PM
To: Laura Menninger <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliari@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Counsel,

In advance of our call tomorrow, I wanted to send a copy of the attached index of physical items in FBI custody from the FBI-Miami office, which we previously produced to you as part of our August 21, 2020 discovery production. Also included in that August 21, 2020 production were scans of numerous items listed on the index. Those scans can be found within Bates range SDNY_GM_00172218-SDNY_GM_00173007. It may be useful to reference some of those items during our conversation tomorrow, so I wanted to make sure you were aware of them.

Best,

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

From: [REDACTED]
Sent: Tuesday, March 9, 2021 2:03 PM
To: 'Laura Menninger' <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliari@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Yes, that works for us, thank you very much. We can use the below dial-in:

Dial-in: [REDACTED]
Code: [REDACTED]

Best,

From: Laura Menninger <lmenninger@hmflaw.com>

Sent: Tuesday, March 9, 2021 11:19 AM

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

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Good morning,

We are free at 1:30 p.m. ET / 11:30 a.m. MST tomorrow. Would that work? We are generally free thereafter, so please suggest another later time if not.

Thank you,
Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, March 9, 2021 8:36 AM

To: Laura Menninger <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Good morning,

It would be helpful to have a call to discuss the requests contained in this letter. Are there times tomorrow when you would be available to speak, please?

Thank you,
[REDACTED]

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

From: Laura Menninger <lmenninger@hmflaw.com>

Sent: Monday, March 8, 2021 2:03 PM

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

(USANYS) <[REDACTED]>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

Subject: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Counsel –

Please see attached correspondence.

-Laura



Laura A. Menninger
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203
Main 303.831.7364 FX 303.832.2628
lmessenger@hmflaw.com
www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you.