

From:

To:

Cc:

Subject: Letter to AJN re Maxwell discovery deadline

Date: Fri, 06 Nov 2020 15:28:42 +0000

Attachments: 2020-11-06_GM_letter_requesting_extention_of_discovery_deadline_v4.docx; 2020-11-06_GM_affidavit_of_certification.docx

Chiefs,

This morning [REDACTED] said the defense would consent to our requested extension on four conditions:

1. Extend the motions schedule by 3 weeks
2. Provide Maxwell with a laptop on which to review her discovery at the MDC by November 23rd
3. Provide the defense with the names of the Minor Victims by November 23rd
4. Provide all 3500 material by November 23rd

We told [REDACTED] that we would agree to the first two conditions but could not agree to the last two. [REDACTED] said he understood (he seemed to expect that response) and that we should just note those conditions in our letter to Judge Nathan.

Attached is a revised letter to Judge Nathan adding in the defense conditions and our responses to them. I've also attached a draft affidavit confirming we have conferred with the defense in good faith.

Thanks,