

From: "[REDACTED]" <[REDACTED]>

To: "[REDACTED]" <[REDACTED]>

Subject: RE: Items to Reproduce

Date: Fri, 18 Dec 2020 21:21:55 +0000

Attachments: 2020.12.18_Maxwell_Discovery_Letter_(final).pdf

Thanks! Slightly tweaked version attached. Would you please include this version of the cover letter on the CD with the production for Maxwell?

From: [REDACTED] <[REDACTED]>

Sent: Friday, December 18, 2020 3:49 PM

To: [REDACTED] <[REDACTED]>

Subject: RE: Items to Reproduce

Sounds great, thank you so much! Here is the PDF of the letter. I'll add it to the disc heading to MDC and leave it for FedEx pickup momentarily.

From: [REDACTED] <[REDACTED]>

Sent: Friday, December 18, 2020 3:45 PM

To: [REDACTED] <[REDACTED]>

Subject: RE: Items to Reproduce

Thanks so much! I would remove the "In recognition" phrase and just start the sentence with "Due to an error".

You can also delete the paragraph in the cover letter referring to the letter being designated confidential because this production doesn't have any confidential materials (at least that's my understanding, but let me know if I'm wrong).

From: [REDACTED] <[REDACTED]>

Sent: Friday, December 18, 2020 3:43 PM

To: [REDACTED] <[REDACTED]>

Subject: RE: Items to Reproduce

Of course! Does this language sound okay?

In recognition of the Government's ongoing discovery obligations, and due to an error in Bates stamping, today we are reproducing the materials listed in the below index. These items were originally produced with incorrect Bates numbers that resulted in overlaps. These errors have now been corrected. These discovery materials are now stamped with the correct control numbers SDNY_GM_02742184 through SDNY_GM_02742302.

From: [REDACTED] <[REDACTED]>

Sent: Friday, December 18, 2020 3:40 PM

To: [REDACTED] <[REDACTED]>

Subject: RE: Items to Reproduce

Thanks so much, [REDACTED]. Would you mind revising the cover letter to counsel to explain the correction that was made to these documents? I just want to clarify that these are not new documents and why we are reproducing them.

From: [REDACTED] <[REDACTED]>

Sent: Friday, December 18, 2020 1:03 PM

To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: RE: Items to Reproduce

Of course, and I'm sorry it happened in the first place! Attached please find the cover letter draft (if that's helpful), as well as the seven re-stamped items. I also added them to the shared and updated our discovery index. Thanks so much! I'll begin burning a CD for the MDC now.

From: [REDACTED] <[REDACTED]>
Sent: Friday, December 18, 2020 12:57 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
[REDACTED] <[REDACTED]>
Subject: Re: Items to Reproduce

Thanks you so much for catching that, letting us know, and fixing it so quickly, [REDACTED]. Really appreciate that. Please just let me know when the reproductions are ready to go, and I'll email defense counsel and the MDC.

On Dec 18, 2020, at 11:36 AM, [REDACTED] <[REDACTED]> wrote:

Hi all,

I was updating the discovery index for Maxwell and unfortunately realized that seven items (two items from the 7th Production, located [here](#); and all five PDFs from the 8th Production, located [here](#)) will have to be reproduced, as their Bates numbers were slightly incorrect (missing a digit in the middle of the bates number). I can re-stamp and update them in the shared momentarily – but my apologies that we're just now catching this!

The seven reproduced items will consist of one Excel file and six PDFs, so they'll be small enough to email to defense counsel and small enough to put on a disc to send to Maxwell at MDC. I can draft a cover letter detailing the reproduced items and their updated Bates ranges, and since I'm in the office today I can send the disc out to MDC this afternoon.

Thanks so much for your understanding!

[REDACTED]
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