

From: "[REDACTED] [Contractor]" <[REDACTED]>
To: "[REDACTED] Contractor]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>

Subject: Drives for Maxwell's defense counsel

Date: Sun, 29 Nov 2020 23:08:09 +0000

Attachments: All_GM_MDC_Productions_for_Defense_Counsel_Index.xlsx

Embedded: Copy_of_production_from_PAE.msg

[REDACTED], thank you so much, again, for going into the office tomorrow to get these drives started! Attached is an Excel index of everything that needs to be copied onto the drives defense counsel supplied us. Below, please find clarifying notes about where to find the requisite materials. [REDACTED], please let us know if something is missing or shouldn't be included. Thanks so much, all!

- **All items from the shared that are outlined on the attached Excel index**
 - *Note:* Due to space constraints, the Sixth Production was not stamped on the shared. [REDACTED] was making a hard drive copy of everything we sent to Maxwell at MDC on 11/09/2020, and the stamped Sixth Production should be included on that drive copy. He should have that hard drive copy ready by now, for us to use.
 - If it's not ready yet [REDACTED] has a copy of the stamped Sixth Production on her local drive and can try to upload it to the shared tomorrow morning.
- **All responsive items marked CONFIDENTIAL from our device review** (this makes up one part of Production 6 that is not on the shared)
 - *Note:* [REDACTED] should have these stamped items on the hard drive copy he was making (the same referenced above)
- **SDNY_PROD008, PROD009, PROD011, PROD012, and PROD013 from PAE** (this makes up the other part of Production 6 that is not on the shared)
 - *Note:* [REDACTED] should have these stamped items on the hard drive copy he was making (the same referenced above)
- **All items (PROD015 – PART 01 through PART 07, and PROD016) from the most recent drive that PAE should have sent to me** (this makes up the part of Production 7 that is not on the shared)
 - *Note:* As of Friday 11/20, I had not yet received this drive. [REDACTED] was going to coordinate (see attached email) getting a drive to PAE for them to then send out to me.

TLDR; -- Everything we need to provide defense counsel with is either on A) the drive copy [REDACTED] made for us, B) the shared, or C) the (hopefully forthcoming) drive from PAE. Given the breadth of the hard drive copy that [REDACTED] made, we should begin copying from there, as it includes most of the requisite items. Because we removed all highly confidential items from Maxwell's productions, there should be no highly confidential items included anywhere on these drives that we will return to defense. Given how many hours it took to load the Sixth Production alone, I'm guessing this will be a multi-day copy job as well, and given the volume, we might need some help from [REDACTED].

Thanks again, [REDACTED], and I'll be online working from home starting at 8:00am tomorrow, so please call me anytime if you want to discuss!

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