

From: "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re: Discovery review project
Date: Wed, 14 Oct 2020 13:16:02 +0000

I believe it's [REDACTED]; I'll make the change.

On Oct 14, 2020, at 9:08 AM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Do we have [REDACTED] first name anywhere? If so, can we add it and change the entry to "[REDACTED]"? Otherwise, looks good to me.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Wednesday, October 14, 2020 9:05 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: Discovery review project

Nothing specific - just to give it the final go-ahead in case there is anything you feel needs to be changed. The only difference from the previous version is the addition of [REDACTED] as employee 30.

On Oct 14, 2020, at 9:02 AM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Yes, please. And what would you like us to review in the index?

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Wednesday, October 14, 2020 9:01 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

One more thing – we previously discussed making a note on the cover about the text/native files from the Relativity export being confidential given they do not bear physical stamps. Do we still want to do this before sending the letters?

From: [REDACTED] (USANYS) [Contractor]
Sent: Wednesday, October 14, 2020 8:49 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Before I email them and share the productions will you take a look at the anonymizing index attached?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, October 13, 2020 7:55 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Here are the final cover letters. You can send them to defense counsel and give them USAfx access whenever it is ready. Thanks a lot.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Tuesday, October 13, 2020 1:08 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Redactions and stamping are all set. Everything is currently being zipped for upload to USAfx. I've drafted up cover letters to both Noel and Thomas. They are attached and saved on the shared.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, October 13, 2020 12:10 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Great!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Tuesday, October 13, 2020 12:01 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Once I apply the redactions and stamp those documents, the production will be ready to go out. I will let you know once that is finished.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, October 13, 2020 11:42 AM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: Discovery review project

[REDACTED]

As per the attached, there are no additional redactions in the two outstanding FOIA email files. Let us know where the discovery stands.

Thanks,

[REDACTED]

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 09, 2020 4:06 PM
To: [REDACTED] (USANYS) <[REDACTED]>

Cc: [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: Discovery review project

Hi [REDACTED],

I apologize for the delay, I've reviewed the two files please see attached V3 of the spreadsheet.

I am flagging 2 parts I was uncertain about, similar to earlier. (See below & in the spreadsheet)

On Emails 2_Part 4: I did note the same category as earlier with an email chain from Tartaglione's counsel regarding leak/retaliation at MCC of a news story of Tartaglione questioned about attack on Epstein, and also on pg. 104 where Epstein informs a psychologist that Tartaglione discussed potentially injuring him without a guards' report.

But both of those I was a bit uncertain whether they should be withheld.

Hope this helps!

[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>

Sent: Friday, October 9, 2020 10:39 AM

To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>

Cc: [REDACTED] (USANYS) <[REDACTED]>

Subject: Re: Discovery review project

Perfect.

Sent from my iPhone

On Oct 9, 2020, at 10:38 AM, [REDACTED], [REDACTED] (USANYS) <[REDACTED]> wrote:

Hi [REDACTED],

Yes of course! I'm in class right now, but I should be able to work on this afternoon, and hopefully turn it back around by around 3pm if that's okay?

[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>

Sent: Friday, October 9, 2020 10:32 AM

To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>

Cc: [REDACTED] (USANYS) <[REDACTED]>

Subject: RE: Discovery review project

[REDACTED],

There are replacements for the two corrupt files in the same shared directory you used before. Would you be able to take a look at those today and add them to this version of the spreadsheet (which has a few edits from what you sent)?

Thanks so much,

[REDACTED]

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 07, 2020 12:02 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Hi [REDACTED]!

Okay, I finished up the remaining (pending the 2 pdfs I cannot open). I also noticed an error in the previous excel sheet, please utilize V2 moving forward (attached).

I grouped & highlighted 3 portions of different PDFs that, potentially could be withheld, as they're email correspondence regarding Tartaglione but in relation to an Epstein incident. I tried to better define them in the spreadsheet and color coded by grouping. For the most part, each group is the same email chain, albeit with a response or two added.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 7, 2020 10:42 AM
To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Thanks for this. I will ask our paralegal to check out the damaged documents.

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 07, 2020 10:38 AM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Discovery review project

Hi [REDACTED],

Following up with a quick update, I've got 6 PDF's left to review. Wanted to flag that for some reason 2 of the PDF's (Emails 2_Part4 & Emails 3_Part 2) will not open and I get a "document is damaged" error from Adobe. I've tried logging out of the portal and restarting computer but no luck so far.

I'm attaching the current spreadsheet so you can see how I've gone about flagging portions of the PDFs. I've noted a few uncertain areas in the notes where it may be Tartaglione issue but related to Epstein/request to be interviewed or for preservation.

Hope this is on the right track!

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 2, 2020 2:12 PM
To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Discovery review project

Hello [REDACTED],

As we discussed, I would like you to review the email files only in the folder listed below. Please identify any pages in the documents that relate solely to (1) the conditions of confinement for Tartaglione or (2) emails with [REDACTED] [REDACTED] regarding Touhy. You should create a document (spreadsheet maybe) that identifies the name of the PDF file and the pages that fall in each category, so that the paralegals can redact those pages.

Here's where you will find the documents: [REDACTED]
[REDACTED]

You only need to review the emails, not the other documents in the folder.

Let me know if you have any questions or issues once you start working on the project. Let's aim for the end of the day on Wednesday.

Thanks for your help,

[REDACTED]

[REDACTED] [REDACTED]

Assistant United States Attorney
United States Attorney's Office
Southern District of New York

Tel: [REDACTED]

Fax: [REDACTED]

[REDACTED]