

[REDACTED]

Subject: RE: Status update: Maxwell discovery issue files review

Date: Fri, 21 May 2021 02:43:49 +0000

Great, thank you!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, May 20, 2021 10:00 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

The two part upload worked, and the production is ready to be shared with defense counsel once we have their info to set them up on USAfx. I'll be online for a bit longer tonight in case they get back to us ASAP with that, otherwise I'll add them in the morning. Thank you very much for your patience, and we'll get the production sent out on a disc for Maxwell at MDC tomorrow.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, May 20, 2021 8:38 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

Thanks! Let me know once you've tried the split upload. Once I hear from you, I'll email defense counsel.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, May 20, 2021 8:38 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

[REDACTED] just had the idea to try and split the production into two smaller uploads to put on USAfx, so I'm going to try that and see if it works. Otherwise I'll put it on a disc in the morning for counsel and for Maxwell, though it might be worth noting (either just among us or to defense counsel) that if she can't view non pdf image files she will not be able to view the vast majority of this production.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, May 20, 2021 8:31 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)

<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>

Subject: RE: Status update: Maxwell discovery issue files review

Ok, no problem. Will you also be able to put it on a disc to send to the MDC for Maxwell, please?

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

Sent: Thursday, May 20, 2021 8:30 PM

To: [REDACTED] <[REDACTED]>

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

Subject: RE: Status update: Maxwell discovery issue files review

Actually, unfortunately, the production has failed to upload to USAfx, so we may just need to stick it on a disc tomorrow morning.

From: [REDACTED] (USANYS) [Contractor]

Sent: Thursday, May 20, 2021 8:24 PM

To: [REDACTED] <[REDACTED]>

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

Subject: RE: Status update: Maxwell discovery issue files review

Feel free to email defense counsel, the production is uploading to USAfx now. We'll just need the email addresses and cell phone numbers to make USAfx accounts for whoever they want to have access to the production (defense counsel or their litigation support people or whoever) so we can share it with them once it's uploaded. Thank you!

From: [REDACTED] <[REDACTED]>

Sent: Thursday, May 20, 2021 8:17 PM

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

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

Subject: RE: Status update: Maxwell discovery issue files review

Perfect, thank you! This is ready to go. Ok for me to email defense counsel with the letter and spreadsheet now? Or do you need any more time to prep the production?

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

Sent: Thursday, May 20, 2021 7:59 PM

To: [REDACTED] <[REDACTED]>

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

Subject: RE: Status update: Maxwell discovery issue files review

Updated discovery letter is attached (saved [here](#)) with the spreadsheet as well for reference. Let me know if you have any additional revisions.

From: [REDACTED] <[REDACTED]>

Sent: Thursday, May 20, 2021 7:15 PM

To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

Perfect, thanks. Let's plan to jump on a call at 7:30.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, May 20, 2021 7:15 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)
<[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Subject: Re: Status update: Maxwell discovery issue files review

I will be home in 5-10 if that's okay with you all to wait just a few min?

Sent from my iPhone

On May 20, 2021, at 7:13 PM, [REDACTED] <[REDACTED]> wrote:

That sounds good! I've reviewed what [REDACTED] sent. Are you all available to hop on a call now?

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, May 20, 2021 6:26 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
<[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

I think we're all around to hop on a call tonight. We were thinking it would be efficient to discuss the materials that [REDACTED] just sent around on the same call. Let us know if you'd like time to review those materials before hopping on the call.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, May 20, 2021 6:12 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)
<[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Subject: RE: Status update: Maxwell discovery issue files review

Thanks so much! Can we hop on a quick call to talk this through? Either this evening or tomorrow morning is fine.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, May 20, 2021 5:10 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
<[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]

<[REDACTED]>

Subject: RE: Status update: Maxwell discovery issue files review

Hi [REDACTED],

Attached is the spreadsheet with each problem file that Maxwell's counsel listed and our corresponding notes. This does not include the "Images Not Exported" section as we are having [REDACTED] re-export those for us to double check. There is one group of files that we'd like to bring to your attention:

In the "Corrupt" tab of the spreadsheet you'll see that there are a number of files which are labeled "Lazer Scan." These are the same files that we dealt with last August/September (linked [here](#)), which I believe we worked out to be 3D renderings and scans of Epstein's compound. [REDACTED] and I both recall dealing with this extensively but are having trouble locating emails documenting that fact other than the attached. Happy to discuss over the phone if you'd like and determine a better way to mark them in the spreadsheet.

Besides that, the list of files should be good to go. And we can inform counsel tonight that we are already working with the vendor to address any files we found to have any issues.

Please let us know if you have any questions or comments on the spreadsheet.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Thursday, May 20, 2021 11:58 AM

To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)

<[REDACTED]>; [REDACTED] <[REDACTED]>

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

<[REDACTED]>

Subject: RE: Status update: Maxwell discovery issue files review

Great, thanks. I'll send an invite for 1:30.

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

Sent: Thursday, May 20, 2021 11:54 AM

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

<[REDACTED]>

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

<[REDACTED]>

Subject: RE: Status update: Maxwell discovery issue files review

Of course. [REDACTED], and I are all available from 1pm on.

From: [REDACTED] <[REDACTED]>

Sent: Thursday, May 20, 2021 11:53 AM

To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS)

<[REDACTED]>; [REDACTED] <[REDACTED]>

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

<[REDACTED]>

Subject: RE: Status update: Maxwell discovery issue files review

Hi [REDACTED],

Can we have a call to touch base on this today, please?

Thanks,

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

Sent: Friday, May 14, 2021 5:58 PM

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

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

Subject: Status update: Maxwell discovery issue files review

Hi all,

Here is our status update for the review of discovery files that Maxwell is having various issues with, categorized by issue and whether the file was from a PAE export or something we stamped on the shared.

- Blank files
 - From PAE export (29 pages/files): all but one of these files that were described as “blank” were in fact blank files; nothing more to do for these files. The one non-blank file among these (SDNY_GM_00218894) has no native file that was produced with it (we will look into/confirm with PAE re: whether this was intentional or an oversight), but the image produced for this Bates number should not appear “blank.”
 - From shared drive/stamped by SDNY (308 pages/files): none of these pages were blank. They all were pages within Deutsche Bank records from Production 2.
- Corrupt files
 - From PAE export (501 pages/files): the initial review of these files is complete, and 290 documents were corrupt in their native produced form when we opened them. There are additionally about 160 documents of varying file types that we did not identify as corrupt but had various issues opening or viewing, which could possibly explain why she had an issue with them. We (paras) can confer more about these files early next week and let you know what we think we should do next (e.g., ask PAE to re-export them, determine whether we/she has appropriate software for viewing, etc.). The remaining pages/files among the 501 identified for review in this category are duplicates of other Bates identified as “corrupt.”
 - From shared drive/stamped by SDNY (2152 pages/files): none of the pdf files identified by defense as “corrupt” were corrupt per our review; all files were able to be opened, and all Bates numbered pages were able to be viewed.
 - However, there is a range of files (SDNY_GM_00169505-SDNY_GM_00169737 from Production 3 (SDNY_GM_00166191-SDNY_GM_00169759 (Search warrant photos))) that defense listed as “corrupt” but they seem to be weird computer/electronic system files. I cannot open these files to see what they are (many seem to be .fls files or other systems-related unknown file types), and I’m not sure if you previously identified what these files are in particular, either internally when initially producing them or to defense counsel. These files can be found [here](#) for our reference/review, and we (paras) will again touch base about these next week to determine to what extent we can help her view them (or whether they are even viewable to us).
- Missing
 - From PAE export: pending review of master copy discovery hard drive
 - From shared drive/stamped by SDNY: neither file is missing/no issues with these files
- Can’t read/won’t open
 - From PAE export: pending review of master copy discovery hard drive
 - From shared drive/stamped by SDNY: no issue with these files
- Not supported
 - From PAE export: pending review of master copy discovery hard drive
 - No files with this issue from shared drive/stamped by SDNY
- Images not exported

- From PAE export: pending review of saved searches from [REDACTED]
- From shared drive/stamped by SDNY: no issues with these files

All in all, the files identified as “blank” and “corrupt” are nearly done being reviewed, and we’ll aim to get as much done as we can on the remaining categories in the next week. Let us know if you have questions based on this initial review, and we’ll keep you posted as we made additional progress.

Thanks,

[REDACTED]

[REDACTED]

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New York, NY 10007
Office: [REDACTED]
Cell: [REDACTED]