

**From:** "[REDACTED], [REDACTED] (USANYS) [Contractor]" <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Cc:** "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>

**Subject:** RE: [REDACTED] materials

**Date:** Thu, 18 Nov 2021 00:49:28 +0000

**Attachments:** 2021.11.18\_Maxwell\_Discovery\_Letter.docx

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Sorry for the delay on prepping these materials for production—I noticed one discrepancy (one empty folder) that I asked the agents to check on, and they did confirm that it was empty originally rather than due to any sort of error.

These production is saved here for your review: [REDACTED]

And the draft cover letter is attached (saved [REDACTED]). Because there are several [REDACTED] deposition video clips that we could not find as having been produced the production is around 13GB, we will need a hard drive from defense counsel. While we haven't produced these clips, the transcript for this deposition was produced in April as [REDACTED] 3500, specifically 3501.183-020. We should request a hard drive of at least 32GB from defense counsel (we still have two hard drives for Maxwell, both of which are sufficiently large to accommodate the production).

Let me know what you think or if you have any questions.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, November 15, 2021 5:03 PM  
**To:** [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
**Subject:** RE: [REDACTED] materials

Ah, okay. Rule 16, please. Thanks!

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**From:** [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
**Sent:** Monday, November 15, 2021 4:25 PM  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
**Subject:** RE: [REDACTED] materials

No. All of the files at the link below were not produced in 3500, though it seems like some of the longer ones may have been produced in Rule 16 (a few hundred page docs that appear to be subpoena returns that we have not checked every page of which, for example, some of the docs [REDACTED]). Since they have either not been produced or not entirely confirmed as having been produced, I was wondering whether these documents at the link below should be produced as 3500 or Rule 16?

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, November 15, 2021 4:21 PM  
**To:** [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

<[REDACTED]>  
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Subject: RE: [REDACTED] materials

Thanks! Just to make sure I'm following: are you saying that all of these files have been produced to the defense already, either as Rule 16 or 3500?

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From: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Sent: Monday, November 15, 2021 4:20 PM  
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Subject: RE: [REDACTED] materials

[REDACTED] and I reviewed these materials and confirmed that some of these files were definitely produced as [REDACTED] 3500, but others were not (though some of the longer records resemble other materials, e.g., subpoena returns, that were produced previously in Rule 16): [REDACTED]  
[REDACTED]

There was one folder of miscellaneous files that seemed to be some sort of FBI audio software that had been marked as DNP for NTW production 2. Other than this folder, do you want the files that do not appear to have been produced for [REDACTED] 3500 added to the pending NTW 3500 production (i.e., rather than produced as Rule 16)?

-----Original Message-----

From: [REDACTED] <[REDACTED]>  
Sent: Thursday, November 11, 2021 1:49 PM  
To: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>  
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
Subject: [REDACTED] materials

Hi [REDACTED],

We recently had an evidence inspection, and defense counsel inspected a number of items from the [REDACTED] case. I have asked the FBI to scan the paper and give us a copy of any electronic materials that were in that set of materials, so that we could double check these items were produced in discovery. [REDACTED] should be connecting with you to get you a copy so that we can cross reference items produced in discovery.

Thanks,

[REDACTED]