

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

Subject: RE: [EXTERNAL] Hard Drives

Date: Wed, 29 Sep 2021 14:03:29 +0000

Importance: Normal

Attachments: 2021.09.29_MDC_-_Maxwell_PASSWORD.pdf; 2021.09.29_MDC_-_Maxwell_MAIN.pdf

Hi [REDACTED],

The drive has been packaged up and left for FedEx pickup. The two cover letters are attached (also saved [here](#)) for your reference.

Thanks,
[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Tuesday, September 28, 2021 10:54 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [EXTERNAL] Hard Drives

Hi [REDACTED],

Yes, please. Can you please load the drive and send it out tomorrow? Defense counsel just emailed about this so I will let them know our paralegals received the drive today (9/28) and the hard drive will be in the mail tomorrow.

Thanks,
[REDACTED]

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Tuesday, September 28, 2021 1:02 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: [EXTERNAL] Hard Drives

Hi all,

We just received the hard drive from Cohen & Gresser. Before I load the drive, I just wanted to confirm that we are to send the [Twentieth Production](#) back to MDC (a replacement for what was just returned on the disc). Should anything else be added?

Thanks so much!

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

Sent: Friday, September 24, 2021 3:52 PM

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

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] Hard Drives

All set w removing [REDACTED] name and signature and will leave the disc and pw to go out in the mail. I haven't yet been able to track down the drive (mail guys have proved extra elusive today) but will do another sweep for it before I leave later this evening.

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

Sent: Friday, September 24, 2021 3:07 PM

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

<[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] Hard Drives

Thanks [REDACTED]. The letters look good but can you remove [REDACTED] name and signature and just put a s/? Then they can go out.

Keep us posted on the drive, please. Thanks!

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

Sent: Friday, September 24, 2021 12:14 PM

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

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: [EXTERNAL] Hard Drives

We haven't received the disc back from MDC but I've burned another copy of the 9/13 production and will send it directly to Maxwell (I've confirmed the correct address to send it to courtesy of other paras with defendants at MDC). Cover letter and password letter are attached; once you confirm these are okay, I'll send the disc and password out to her today.

Re: the drive from defense, I think it was delivered yesterday but the mail room intercepted it before I could grab from the drop box. I'll work on getting it from them this afternoon if it isn't delivered to [REDACTED] desk. Does this drive just need the same production loaded onto it as was loaded on the disc, or is there anything else that needs to be loaded on it (understanding we'll hold off on sending it out until you guys confer re: MDC's request)?

Re: a drive for 3500, I anticipate a drive of 64GB would be more than sufficient to hold all 3500 we will have either previously produced or will be producing imminently (not sure from the email below if they're looking for a full complete set of 3500 or just the new stuff). We could also probably put the GX on the same drive if that's useful.

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

Sent: Friday, September 24, 2021 10:52 AM

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

<[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Fwd: [EXTERNAL] Hard Drives

[REDACTED]

Did you receive the disk back from MDC? Can we get that disk or another one with the same materials sent to the defendant in accordance with [REDACTED] instructions? (How have we been sending disks with discovery?) Also, did you get the hard drive and if so, can we load it with the discovery? We will get back to you on sending it given [REDACTED] email yesterday.

Also, do you have thoughts on what we should suggest in terms of the hard drives for 3500? I know we have a bunch of review to do still.

Thanks,

[REDACTED]

Begin forwarded message:

From: Christian Everdell <[REDACTED]>
Date: September 24, 2021 at 10:38:55 AM EDT
To: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, [REDACTED], Jeff Pagliuca <[REDACTED]>, Laura Menninger <[REDACTED]>, "Thomas J. Powers" <[REDACTED]>
Subject: [EXTERNAL] Hard Drives

[REDACTED], [REDACTED] and [REDACTED] –

I am emailing about a few items. First, we realized we never sent you a hard drive for the most recent 9/13 production to send to Ms. Maxwell. We sent it to 1 STA yesterday to [REDACTED] attention. Can you confirm receipt? And I don't think she has received the disk you sent. Can you confirm that it was sent to MDC?

Second, we wanted to return to you about the size of the hard drives we will need to get you for the production of 3500 material. As we mentioned on our last call, we want to be able to receive the loaded hard drives on the day of the deadline on Oct. 11, so we would like to deliver the drives to you early so that they can be loaded ahead of time. You told us on the last call to contact you this week so that you could advise us on the size of the drives. Can you tell us how big the drives need to be?

Third, can you tell us the status of the Touhy request we made on August 30?

Thanks,

Chris

Christian R Everdell

<image001.gif>

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)
www.cohengresser.com

New York | Paris | Washington DC | London <image002.gif>

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