

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

Subject: RE: Maxwell Discovery

Date: Fri, 09 Apr 2021 15:01:31 +0000

Attachments: 2021.04.09_Maxwell_Discovery_Letter.docx; 2021.04.09_Maxwell_Discovery_Letter.pdf

The date has now been updated on the letter.

From: [REDACTED] <[REDACTED]>
Sent: Friday, April 9, 2021 10:32 AM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Maxwell Discovery

No, the letter did not go out last night, thanks for checking. Would you please change the date on the letter?

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Friday, April 9, 2021 10:31 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Maxwell Discovery

Did the letter go out to defense counsel last night? Just wondering if we should be re-dating it for today before loading materials to the CD.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 8, 2021 8:11 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: Re: Maxwell Discovery

Thanks! I'm going to send the letter to defense counsel and ask for a link— everything all set to go otherwise? When you make the CD for the defendant, please convert the excel spreadsheets to PDF. Thanks.

Sent from my iPhone

On Apr 8, 2021, at 7:48 PM, [REDACTED] (USANYS) [Contractor] <[REDACTED]> wrote:

I should also mention that we'll be able to send this production to defense through their FTP site.

On Apr 8, 2021, at 6:31 PM, [REDACTED] <[REDACTED]> wrote:

I made one addition to the footnote in the attached. [REDACTED], when you have a chance would you please call me back on this? Just had one quick question.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, April 8, 2021 6:19 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: Maxwell Discovery

Fine with me, thanks

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 08, 2021 5:43 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Thanks – revised letter attached. [REDACTED] and [REDACTED], please feel free to make any edits.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, April 8, 2021 5:26 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Here you go!

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 8, 2021 5:22 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Sure! [REDACTED] if you can shoot over a draft of the cover letter whenever it's ready, I'll add a very short footnote.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 8, 2021 4:53 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Thanks! [REDACTED], would you please handle the cover letter revisions to include a response to Everdell's recent letter?

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, April 8, 2021 4:47 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>;
[REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

The last of the PYPD surveillance video footage saved [here](#) is being converted to a viewable format. Once it's finished, which should be soon, the production will be ready to go out. Everything else is stamped and on the [shared](#).

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 8, 2021 11:30 AM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>;
[REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Please just stamp the pdf and remove the txt file. Thanks!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, April 8, 2021 11:21 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>;
[REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Quick question. The investigative file here [\[REDACTED\]](#) has both a .pdf and a .txt version of the documents. The contents of these files are identical. Should I be stamping both or just the pdf?

From: [REDACTED] <[REDACTED]>
Sent: Thursday, April 8, 2021 12:15 AM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>;
[REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Terrific, thank you!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, April 8, 2021 12:00 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>;
[REDACTED] (USANYS) <[REDACTED]>
Subject: Re: Maxwell Discovery

I can stamp this first thing in the morning. The usable Amex production came in today and the video/audio files have been converted to useable formats. Other than that I don't think there were any hiccups holding us up.

On Apr 7, 2021, at 11:39 PM, [REDACTED] <[REDACTED]> wrote:

FYI, I moved all of the 72 case stuff into that folder and renamed it so that it is separate from the rest of that production.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, April 7, 2021 11:24 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Hi [REDACTED]

Just checking in on this discovery project – I think the folder is now here:

[REDACTED]

Do you have a sense of how long this batch will take to prep?

Thanks,

[REDACTED]

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Friday, March 19, 2021 9:51 AM
To: [REDACTED] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Maxwell Discovery

Hey [REDACTED],

Thanks very much for the advanced notice on these materials. We will work on getting them prepped and ready to produce.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Thursday, March 18, 2021 6:17 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Maxwell Discovery

Hi [REDACTED] and [REDACTED],

We are planning to make a supplemental discovery production in a few weeks (after superseding), and we wanted to send you the materials in advance, particularly because they contain some audio files that may have some issues. The materials are in the folder below – could you please take a look and begin prepping them?

[REDACTED]

As always, thanks so much for your herculean efforts on this case.



<2021.04.08 Maxwell Discovery Letter v2.docx>