

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

Subject: RE: Joint Letter re: Redactions to MILs

Date: Fri, 29 Oct 2021 18:28:24 +0000

Attachments: 2021.10.29_MDC_-_Maxwell_MAIN.docx; 2021.10.29_MDC_-_Maxwell_PASSWORD.docx

Inline-Images: image001.gif; image002.jpg

I've loaded the drive and it should be ready to go out (if you'd like to look at it just let me know, otherwise I think it's good to go out). Cover letters attached for your review, and we can send it via FedEx this afternoon.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 29, 2021 2:14 PM
To: [REDACTED]; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Joint Letter re: Redactions to MILs

This looks right. If you want me to take a look at anything, I can stop by.

From: [REDACTED] <[REDACTED]>
Sent: Friday, October 29, 2021 1:44 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Joint Letter re: Redactions to MILs

I've received the drive and am confirming that the following should be loaded onto it:

- 10/13 discovery production (spreadsheets)
- 10/25 3500 production (contains TW and NTW productions and updated indices)
- 10/25 discovery production (AIC, AT&T, VR birth certificate)
- 10/28 GX production (GXs 14, 16, 416-B and updated index)
- 10/28 discovery production (various materials produced last night)

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 29, 2021 12:50 PM
To: [REDACTED]; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: FW: Joint Letter re: Redactions to MILs

Hi [REDACTED] – See below. Can you please keep an eye out for the hard drive and then load it with the below. Happy to walk through what should be on the drive. Let us know if you have any questions. Thanks!

From: Christian Everdell [REDACTED] <[REDACTED]>
Sent: Friday, October 29, 2021 12:48 PM

To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED]; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; Thomas J. Powers <[REDACTED]>
Subject: [EXTERNAL] RE: Joint Letter re: Redactions to MILs

Thanks, [REDACTED]. I will send you our proposed redactions shortly. And I will send you text for the joint letter a little later.

Also, we are delivering to you today (attn: [REDACTED]) a 1TB encrypted hard drive. Please load it with all of the productions since the 10/11 production and send it to Ms. Maxwell at MDC as soon as possible. That should be the 10/13, 10/25, and 10/28 productions.

Please do not use McAfee encryption software to encrypt the data on the drives. That causes enormous problems for us. The drive will have external encryption, so there is no need for the McAfee encryption.

Thanks,

Chris

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 29, 2021 11:51 AM
To: Christian Everdell <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED]; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Subject: RE: Joint Letter re: Redactions to MILs

Thanks, Chris. We intend to send you our proposed redactions to your motions soon. You can then add any proposed redactions to your motions on top of what we send to you. Can you please send us your proposed redactions to our motions, as well as language for us to include in a joint letter about your proposed redactions?

Thanks,

From: Christian Everdell <[REDACTED]>
Sent: Friday, October 29, 2021 11:35 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED]; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>
Subject: [EXTERNAL] Joint Letter re: Redactions to MILs

[REDACTED] –

As I'm sure you know, the Court has ordered the parties to file a joint letter proposing redactions to the MILs by the end of today. We have a few proposed redactions. How do you propose we handle this?

Thanks,

Chris

Christian R Everdell

COHEN & GRESSER LLP

800 Third Avenue
New York, NY 10022

[REDACTED] | [view bio](#)

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