

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

Subject: RE: US v. Maxwell - discovery production

Date: Thu, 12 Aug 2021 19:45:29 +0000

Attachments: 2021.08.12_MDC_-_Maxwell_MAIN.pdf; 2021.08.12_MDC_-_Maxwell_PASSWORD.pdf

The drive is ready to be sent to MDC. The cover letters are attached; if they look good to go, we can leave the drive for FedEx pickup. Thanks so much!

From: [REDACTED] <[REDACTED]>
Sent: Thursday, August 12, 2021 2:26 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

Great, thank you so much!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Thursday, August 12, 2021 2:19 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

We'll work on loading the files to their drive this afternoon; it shouldn't take long. If helpful, below are our explanations for how to open certain file types or explanations for why certain file types will not open or play audio:

- **3501.007** – [REDACTED]
 - 3501.007-007: This file is [REDACTED].txt file. It can be opened with any text editor application.
 - 3501.007-008: This file is an .mp4 file that plays audio. It opens and is audible.
 - 3501.007-009: This file is [REDACTED].json file. It can be read like [REDACTED].txt file and opened with any text editor application.
- **3501.075** – [REDACTED]
 - 3501.075-013: This file is Side B from an original tape recording of [REDACTED]. It opens but does not contain content.
- **3501.091** – [REDACTED]
 - 3501.091-007: This file is Side B from an original tape recording of [REDACTED]. It opens but does not contain content.
- **3501.149** – [REDACTED]
 - 3501.149-043: This folder contains two .BUP files, two .IFO files, and 4 .VOB files. It contains video files and related files.

Regarding 3501.149-043, [REDACTED] and I are not sure of the source (i.e. what Florida entity produced it and when) of the video files. Given that, we were also not sure if deleting the accessory files that don't contain any viewable/listenable info would affect the rest of the video, so we produced the entire thing under one 3500 number.

We'll let you know when the drive is loaded and ready to be sent to MDC via FedEx. Thanks!

From: [REDACTED] <[REDACTED]>
Sent: Thursday, August 12, 2021 1:24 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: FW: US v. Maxwell - discovery production

[REDACTED], you mind handling this, please?

From: Christian Everdell <[REDACTED]>
Sent: Thursday, August 12, 2021 1:23 PM
To: [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

Hi [REDACTED] –

Below are the files that our client is having trouble opening or are inaudible. They are all part of the non-testifying 3500 materials. Please load replacement copies of these onto the drive.

1. 3501.007-007 to 009
2. 3501.075-013
3. 3501.091-007
4. 3501.149-043

Thanks,

Chris

From: [REDACTED] <[REDACTED]>
Sent: Monday, August 9, 2021 8:02 PM
To: Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

Got it, thanks very much. Once we hear from you what materials Ms. Maxwell needs on this drive, we will get it loaded.

From: Christian Everdell <[REDACTED]>
Sent: Monday, August 9, 2021 4:39 PM
To: [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>

<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

[REDACTED] -

The drive is ID CG0001 and the PIN is [REDACTED].

Thanks.

From: [REDACTED] [mailto:[REDACTED]]
Sent: Monday, August 09, 2021 1:32 PM
To: Christian Everdell; Mark S. Cohen; [REDACTED] Menninger; 'Jeff Pagliuca'; 'Bobbi Sternheim'
Cc: [REDACTED]; [REDACTED] (USANYS); [REDACTED]; [REDACTED] (USANYS) [Contractor];
[REDACTED]; [REDACTED] (USANYS) [Contractor]
Subject: RE: US v. Maxwell - discovery production

Hi Chris,

The drive has arrived at our office. Is there [REDACTED] particular password we should use for this drive?

Thanks,
[REDACTED]

From: [REDACTED]
Sent: Monday, August 9, 2021 12:52 PM
To: Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger'
<[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

Got it, thanks very much.

From: Christian Everdell <[REDACTED]>
Sent: Monday, August 9, 2021 12:49 PM
To: [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED]
Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim'
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED]
<[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

It was addressed to [REDACTED]

From: [REDACTED] [mailto:[REDACTED]]
Sent: Monday, August 09, 2021 12:47 PM
To: Christian Everdell; Mark S. Cohen; [REDACTED] Menninger; 'Jeff Pagliuca'; 'Bobbi Sternheim'
Cc: [REDACTED]; [REDACTED] (USANYS); [REDACTED]; [REDACTED] (USANYS) [Contractor];

[REDACTED]; [REDACTED] (USANYS) [Contractor]
Subject: RE: US v. Maxwell - discovery production

Thanks very much. Was the drive addressed to me or someone else in the office? Once we track it down, we'll be happy to load it with whatever materials you request from the prior productions.

Best,

From: Christian Everdell <[REDACTED]>

Sent: Monday, August 9, 2021 12:43 PM

To: [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>

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

Subject: RE: US v. Maxwell - discovery production

Thanks, [REDACTED]. We have also just shipped another padlock drive to you, which may have already arrived. Ms. Maxwell has told us she is having some trouble opening some of the discovery she recently received. I am trying to get [REDACTED] sense of which files she is having trouble with. Once I do, I will likely ask you to load the new padlock drive with some previously produced files.

Thanks.

From: [REDACTED] <[REDACTED]> [mailto:[REDACTED]]

Sent: Monday, August 09, 2021 8:42 AM

To: Christian Everdell; Mark S. Cohen; [REDACTED] Menninger'; 'Jeff Pagliuca'; 'Bobbi Sternheim'

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

Subject: RE: US v. Maxwell - discovery production

Chris,

We received the drives and have finished loading them. As you requested, the padlock drive does not have McAfee encryption software and instead uses the encryption on the drive. That drive for counsel is available to be picked up at 1 St. Andrews now. The drive for Ms. Maxwell is being shipped out to the MDC via FedEx today as well.

Best,

[REDACTED]
Assistant United States Attorney
Southern District of New York

From: Christian Everdell <[REDACTED]>

Sent: Friday, August 6, 2021 12:18 PM

To: [REDACTED] <[REDACTED]>; Mark S. Cohen <[REDACTED]>; [REDACTED] Menninger' <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; 'Bobbi Sternheim' <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: US v. Maxwell - discovery production

[REDACTED] -

I should have mentioned this. To open the padlock drive, please use the info below:

ID: [REDACTED]
PIN: [REDACTED]

Thanks,

Chris

From: Christian Everdell
Sent: Friday, August 06, 2021 11:15 AM
To: [REDACTED]; Mark S. Cohen; [REDACTED] Menninger; Jeff Pagliuca; Bobbi Sternheim
Cc: [REDACTED]; [REDACTED] (USANYS); [REDACTED]; [REDACTED] (USANYS) [Contractor]; [REDACTED]
Subject: RE: US v. Maxwell - discovery production

[REDACTED] -

We are sending [REDACTED] messenger to you shortly with one 1 TB USB drive and one 1 TB padlock drive. The USB drive is for Ms. Maxwell and the padlock drive is for counsel. We will mark them accordingly.

We have had some issues in the past with extracting information from the McAfee encryption program that you use to encrypt the data on the drives. Because the padlock drive already has onboard encryption, can you not use the McAfee encryption software on that drive? Please advise.

Thanks,

Chris

From: [REDACTED] [mailto:[REDACTED]]
Sent: Thursday, August 05, 2021 8:53 PM
To: Christian Everdell; Mark S. Cohen; [REDACTED] Menninger; Jeff Pagliuca; Bobbi Sternheim
Cc: [REDACTED]; [REDACTED] (USANYS); [REDACTED]; [REDACTED] (USANYS) [Contractor]
Subject: US v. Maxwell - discovery production

Counsel,

As I previewed in my email to [REDACTED] yesterday, we now have [REDACTED] set of discovery materials ready to produce to you. Attached please find the cover letter accompanying this production.

For this production, we will need two 500GB hard drives (one for counsel's copy and one for Ms. Maxwell's copy) on which to load the materials. If you would please address those drives to Paralegal Specialist [REDACTED] at [REDACTED] that will enable us to get the drives loaded more quickly.

Best,

[REDACTED]

[REDACTED]

Assistant United States Attorney
Southern District of New York

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]