

[REDACTED] besides [REDACTED] and [REDACTED] whose mbox files did we get from [REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, June 15, 2020 10:01 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: MCC discovery

For category (1), are any of the BOP employees people who were at least tangentially involved in the events in question? If so, given that they are in our possession, I think we should produce pursuant to the protective order, even though they are likely completely irrelevant.

I definitely think we should look through category (2) to figure out what we should produce.

From: [REDACTED] <[REDACTED]>
Sent: Friday, June 12, 2020 5:42 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: MCC discovery

Notwithstanding the Court's discovery order, I want to discuss whether we should be producing any of the following:

- 1) I believe we have mbox files for a number of BOP employees, not just our defendants. I think we only produced the defendants' mbox files. Should we be producing more, which probably include the emails we've been reviewing.
- 2) Is there anything in the BOP's document dumps that we need to produce? In particular, these post-suicide reconstruction reports?

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