

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

**Subject:** Maxwell

**Date:** Sat, 17 Apr 2021 16:14:16 +0000

**Attachments:** Maxwell\_Opinion.pdf; 2020-10-07\_GM\_letter\_to\_Judge\_Nathan\_re\_discovery\_from\_other\_agencies\_(FINAL).pdf

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Hi [REDACTED]

Hope you're doing well. Are you available for a call on Monday to discuss a discovery question? We received an opinion from Judge Nathan yesterday (attached), which denies further discovery on the NPA, but orders us to do the following (on page 8):

"Of course, the Government's disclosure obligations would require it to disclose to Maxwell any exculpatory evidence or evidence material to preparing the defense, including any evidence supporting a defense under the NPA. The Government shall confirm in writing within one week whether it views any evidence supporting Maxwell's interpretation of the NPA as material it is required to disclose, and, if so, whether it has disclosed any and all such evidence in its possession."

We're going to draft a letter, but we were hoping to discuss with you in advance. I'm also attaching our October 2020 letter to the Court, in which we outlined what we were not going to do with other agency files in this case.

Thanks,

[REDACTED]

[REDACTED]

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