

**From:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

**Date:** Wed, 28 Jul 2021 13:04:41 +0000

**Attachments:** 2021.07.28\_Maxwell\_Discovery\_Letter.docx

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The production is all set to go out. I've stamped the PBS [REDACTED] Education Records and Epstein Photo Book confidential with the same stamp as was used for the most recent NTW batch. Attached is a drafted cover letter to go along with these materials.

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**From:** [REDACTED] >  
**Sent:** Tuesday, July 27, 2021 7:39 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**Subject:** RE: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

Thanks very much, [REDACTED].

Would it be possible to please prep everything in the discovery folder here:  
[\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\Discovery\GM\27 Eighteenth Production \(2021-07-xx\)](\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\Discovery\GM\27 Eighteenth Production (2021-07-xx))

We are designating the PBS [REDACTED] Education Records and the Epstein Photo Book confidential, so please use the new stamp we used for the most recent NTW batch for those materials. The rest do not need a designation.

If that can get done quickly, I'd be inclined to include that production on the drives for tomorrow.

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**From:** [REDACTED] >  
**Sent:** Tuesday, July 27, 2021 4:46 PM  
**To:** [REDACTED]; [REDACTED]; [REDACTED]  
[REDACTED] >  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]  
[REDACTED] >

**Subject:** RE: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

The drive for defense has been loaded. The drive for Maxwell has not yet been loaded.

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**From:** [REDACTED]  
**Sent:** Tuesday, July 27, 2021 11:19 AM  
**To:** [REDACTED]; [REDACTED]; [REDACTED]  
[REDACTED] >  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]  
[REDACTED] >

**Subject:** RE: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

Hey,

I have the drives and [REDACTED] work on getting them loaded. Are we including anything else on the 1TB drive for Maxwell?

Thanks,

[REDACTED]

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**From:** [REDACTED] >

**Sent:** Tuesday, July 27, 2021 9:42 AM

**To:** [REDACTED]; [REDACTED]  
[REDACTED]; [REDACTED] >

**Cc:** [REDACTED]; [REDACTED]; [REDACTED]  
[REDACTED] >

**Subject:** Fwd: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

Hi all,

Would one of you please be able to track down these drives for the Maxwell NTW production? They were apparently addressed to [REDACTED]

Thanks!

[REDACTED]

Begin forwarded message:

**From:** Christian Everdell <[CEverdell@cohengresser.com](mailto:CEverdell@cohengresser.com)>

**Date:** July 27, 2021 at 9:25:23 AM EDT

**To:** "[REDACTED]" >

**Cc:** "Bobbi Sternheim ([bcsternheim@mac.com](mailto:bcsternheim@mac.com))" <[bcsternheim@mac.com](mailto:bcsternheim@mac.com)>, Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>, "Mark S. Cohen" <[mcohen@cohengresser.com](mailto:mcohen@cohengresser.com)>, Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>, "[REDACTED]" >

[REDACTED] >, "[REDACTED]" >, "[REDACTED]" >  
[REDACTED] >, "[REDACTED]" >

**Subject:** Re: US v. Maxwell, 20 Cr. 330 (AJN) - non-testifying witness production

Hi [REDACTED] —

It was addressed to [REDACTED]. Let me know if you can't find them.

Sent from my iPhone

On Jul 27, 2021, at 9:10 AM, [REDACTED] <[REDACTED]> wrote:

Thanks very much, Chris. Who were the drives addressed to? I have not received them yet, so I'm wondering whether they might have gone to someone else's office.

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**From:** Christian Everdell <[CEverdell@CohenGresser.com](mailto:CEverdell@CohenGresser.com)>

**Sent:** Sunday, July 25, 2021 11:22 PM

**To:** [REDACTED]; Bobbi Sternheim ([bcsternheim@mac.com](mailto:bcsternheim@mac.com)) <[bcsternheim@mac.com](mailto:bcsternheim@mac.com)>; Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>; Mark S. Cohen <[mcohen@CohenGresser.com](mailto:mcohen@CohenGresser.com)>; Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>

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