

From: "[REDACTED]" <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>

Subject: [EXTERNAL EMAIL] - FW: [EXTERNAL] US v. Maxwell [further conferral regarding photo / video evidence]

Date: Fri, 08 Oct 2021 18:51:47 +0000

Importance: Normal

Hi [REDACTED]

See the email below. On the first paragraph, could you please email us those spreadsheets from the drive? Let us know if there are any issues with us producing this to the defense.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Friday, October 8, 2021 12:14 PM
To: Moe, [REDACTED] <[REDACTED]>
Subject: Fwd: [EXTERNAL] US v. Maxwell [further conferral regarding photo / video evidence]

Begin forwarded message:

From: Laura Menninger [REDACTED]
Date: October 8, 2021 at 12:10:14 PM EDT
To: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Cc: Jeff Pagliuca [REDACTED]
Subject: [EXTERNAL] US v. Maxwell [further conferral regarding photo / video evidence]

Counsel:

I write to confer regarding some of the photographic / video discovery you have provided to date.

First, in my review of the two hard drives at the FBI offices here, I have had an opportunity to review the spreadsheets contained on the hard-drives which contain links to the photo files, as well as data apparently extracted from the photos. The spreadsheets themselves do not have any of the images from the photo files. I am requesting that you disclose the spreadsheets to us so that we can have a record of the photos reviewed in the order in which they are presented by the hard-drives. As I understand it, this spreadsheet replaces the previous Excel spreadsheets with some of that same data. Because the photographs lack any bates numbers, there is no other meaningful way for me to keep a record of which photos have been reviewed, etc.

Second, there is a video that was disclosed to us in the October 4 production (SDNY_2762476), which appears to be the same or similar to SDNY_ 332870 and 332871, produced in the 5th production. One is labeled "Video", the other is labeled "Video from Florida Investigation (Shorter and Longer Versions." Neither of these videos were produced with their original meta-data, nor is there any indication of where or when or how these videos were obtained "from Florida investigation." Can you please produce to us the original as it was obtained including any metadata and also more clearly indicate the particulars of the seizure of the video(s)?

Thank you,
Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 19th Avenue | Denver, CO 80203

