

From:
To:
Cc:

[REDACTED]

Subject: RE: Discovery Tasks for Maxwell on Epstein Relativity Databases

Date: Wed, 14 Oct 2020 16:27:04 +0000

Thanks very much.

From:

[REDACTED]

Sent: Wednesday, October 14, 2020 12:22 PM

To:

[REDACTED]

Cc:

[REDACTED]

Subject: RE: Discovery Tasks for Maxwell on Epstein Relativity Databases

It is possible I sent you the wrong link. I am currently in the White Plains office sending out a hard drive for the production. I will check the link when I get back to my computer and have my RSA token.

Thank you.

[REDACTED]

From:

[REDACTED]

Sent: Wednesday, October 14, 2020 10:48 AM

To:

[REDACTED]

Cc:

[REDACTED]

Subject: RE: Discovery Tasks for Maxwell on Epstein Relativity Databases

Thanks [REDACTED] When I click on the link you sent, it brings me to the "FBI Files from Florida Office" folder, but it appears to bring up all 26,164 documents in that folder, when the production should be a smaller number of documents bearing the tags I listed below. Are you free for a call to discuss?

From:

[REDACTED]

Sent: Wednesday, October 14, 2020 10:02 AM

To:

[REDACTED]

Cc:

[REDACTED]

Subject: RE: Discovery Tasks for Maxwell on Epstein Relativity Databases

Good Morning [REDACTED]

Thank you for the e-mail. Just to confirm can you please review the below search and let me know that everything that is in the search is everything you wish to produce for item three. I want to make sure that we have everything you need before we start the imaging process.

[REDACTED]

EFTA00022047

Thank you.

[REDACTED]

From: [REDACTED]
Sent: Tuesday, October 13, 2020 11:17 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Discovery Tasks for Maxwell on Epstein Relativity Databases

[REDACTED]

Thanks very much for speaking earlier today. As discussed, we are asking for the following three productions to be prepared for the Maxwell case. I've listed those tasks below in the order in which we discussed them, but, as we discussed, if you and the vendor believe a different order would be more efficient, please just let me know.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

As we've discussed, we need all of these materials to be delivered to 1 St. Andrews by the end of October in order to meet our discovery deadline.

Finally, I believe [REDACTED] should be sending you a drive containing the scans of boxes of files from the USAO-SDFL. We need all of those files loaded into the US v Epstein database on Relativity in a new folder entitled "USAO-SDFL Files," ASAP so that we can review them, please.

Thanks very much, as always for your help, and please do not hesitate to reach out if there are any questions or confusion. I'm always happy to chat.

Thanks so much,

[REDACTED]