

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

To: "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>, "[REDACTED]
[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)"
<[REDACTED]>

Cc: "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>, "[REDACTED]
(USANYS) [Contractor]" <[REDACTED]>

Subject: RE: Sixth Production

Date: Mon, 09 Nov 2020 21:36:33 +0000

Attachments: 2020.11.09_Maxwell_Discovery_Letter.docx

Thanks so much, [REDACTED]. Attached is a revised draft of the letter. As we discussed, please double-check the index for which devices had just images, and correct those rows accordingly. You can go ahead and load all the iPhone materials onto the drive.

[REDACTED], any edits before this letter goes out? I don't think there was anything else substantive we needed to add, but let me know if I'm forgetting something.

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>

Sent: Monday, November 9, 2020 2:07 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
(USANYS) <[REDACTED]>

Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]
<[REDACTED]>

Subject: Sixth Production

Hi all!

Great news – after I've reviewed, the drive going to defense today has all the required items for production! I believe we will be uploading NYC024318 1B71 (iPhone) to this drive (and I've noted the tentative bates number for that on the index, attached here and updated on the shared, and in the cover letter, attached) – but other than that, we are all set.

I've attached a (very basic) cover letter for defense, for your review and relevant additions. Since we are reproducing so much to MDC, I also created a unique index for the MDC drive on the shared index. I can attach that chart to defense's cover letter when it goes out, if that would be helpful, or I can just keep the MDC index section for our internal organization.

[REDACTED] is still working on copying the MDC drive. Hopefully we'll have an update soon. I'm happy to make any changes within the cover letter and/or index as necessary. Thank you all!

[REDACTED]
Paralegal Specialist
U.S. Attorney's Office | SDNY

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]