

**From:** [REDACTED] (USANYS) <[REDACTED]  
**To:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
[REDACTED]

**Subject:** RE: Defense Rule 16 Disclosure

**Date:** Thu, 11 Nov 2021 22:56:42 +0000

**Attachments:** 2021.11.08\_Letter\_to\_Government\_re\_Rule\_16\_Disclosure.PDF

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Thank you for doing this. The defense's November 8 letter (attached) lists a bunch of Government discovery in 12 subcategories. Could you please take a look at the letter and put copies of the bates numbers the defense has identified and put them in subfolders in the folder that [REDACTED] created (e.g., AT&T, Federal Express, etc). I added a subfolder as an example. Let me know if you have any questions.

Thanks!

**From:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Sent:** Tuesday, November 9, 2021 12:51 PM  
**To:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED] (USANYS)  
[REDACTED]

**Subject:** RE: Defense Rule 16 Disclosure

Thanks! Saved here: <\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\USvEpstein-2018R01618\\Discovery\\GM\\Defense Rule 16 Disclosures\\2021.11.08 Defense Rule 16 Disclosure>

**From:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Sent:** Tuesday, November 9, 2021 12:44 PM  
**To:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED] (USANYS)  
[REDACTED]

**Subject:** Re: Defense Rule 16 Disclosure

In the discovery folder. Thanks!

On Nov 9, 2021, at 12:25 PM, [REDACTED] (USANYS) [Contractor] <[REDACTED] wrote:

Hi team – apologies for just getting to this now. Where on the shared would you like these saved? Thanks!

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**From:** [REDACTED] (USANYS) [Contractor] <[REDACTED]  
**Sent:** Monday, November 8, 2021 9:40 PM  
**To:** [REDACTED] (USANYS) [Contractor] <[REDACTED] (USANYS) [Contractor]  
[REDACTED]  
**Cc:** [REDACTED] (USANYS) <[REDACTED] (USANYS) <[REDACTED]

[REDACTED]  
**Subject:** FW: Defense Rule 16 Disclosure

Hi [REDACTED]—could you please save these on the shared? Thanks!

---

**From:** Christian Everdell <[REDACTED]>

**Sent:** Monday, November 8, 2021 9:32 PM

**To:** [REDACTED] ( [REDACTED] )

(USANYS) [REDACTED]

**Cc:** Jeff Pagliuca <[REDACTED]> Laura Menninger [REDACTED]

**Subject:** [EXTERNAL] Defense Rule 16 Disclosure

[REDACTED] and [REDACTED]—

Attached is the defense Rule 16 disclosure.

Regards,

Chris

Christian R Everdell

<image001.gif>



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New York | Paris | Washington DC | London <image002.jpg>

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