

From: "████████") <████████>
To: "████████") <████████>, "████████ (USANYS)"
<████████>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes
Date: Tue, 09 Mar 2021 21:01:56 +0000
Inline-Images: image001.jpg

Thanks—I think it would help to even more expressly note that the document is not comprehensive (for example, this spreadsheet doesn't list the yearbooks, so it sounds like it's missing more recent evidence). Proposed addition below.

To my knowledge, that is the only excel spreadsheet in our possession that indexes physical evidence related to this case, **but this is not a comprehensive document**. The discovery productions also included search warrant returns listing the physical items seized by the FBI's New York Office during the 2019 searches of Jeffrey Epstein's residences in New York and the U.S Virgin Islands, but they are not contained in a spreadsheet.

As a courtesy, I have asked the FBI whether it would be possible to provide us with a similar excel index reflecting the physical evidence seized by the FBI's New York Office, though it may take some time to complete such an index.

Best,

From: ██████████) <████████>
Sent: Tuesday, March 9, 2021 3:57 PM
To: ██████████) <████████>; ██████████ (USANYS) <████████>
Subject: FW: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Proposed response below. Good with you?

To my knowledge, that is the only excel spreadsheet in our possession that indexes physical evidence related to this case. The discovery productions also included search warrant returns listing the physical items seized by the FBI's New York Office during the 2019 searches of Jeffrey Epstein's residences in New York and the U.S Virgin Islands, but they are not contained in a spreadsheet.

As a courtesy, I have asked the FBI whether it would be possible to provide us with a similar excel index reflecting the physical evidence seized by the FBI's New York Office, though it may take some time to complete such an index.

Best,

From: Laura Menninger <lmenninger@hmflaw.com>
Sent: Tuesday, March 9, 2021 3:44 PM
To: ██████████) <████████>; ██████████) <████████>; ██████████
(USANYS) <████████>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com)

<ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Thank you. Is that the only index of physical evidence available?

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
+1 303 831 7364 (Office)
lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, March 9, 2021 1:38 PM
To: Laura Menninger <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com)
<ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Counsel,

In advance of our call tomorrow, I wanted to send a copy of the attached index of physical items in FBI custody from the FBI-Miami office, which we previously produced to you as part of our August 21, 2020 discovery production. Also included in that August 21, 2020 production were scans of numerous items listed on the index. Those scans can be found within Bates range SDNY_GM_00172218-SDNY_GM_00173007. It may be useful to reference some of those items during our conversation tomorrow, so I wanted to make sure you were aware of them.

Best,

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Tuesday, March 9, 2021 2:03 PM
To: 'Laura Menninger' <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com)
<ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
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Yes, that works for us, thank you very much. We can use the below dial-in:

Dial-in: [REDACTED]
Code: [REDACTED]

Best,

From: Laura Menninger <lmenninger@hmflaw.com>

Sent: Tuesday, March 9, 2021 11:19 AM

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

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

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Good morning,

We are free at 1:30 p.m. ET / 11:30 a.m. MST tomorrow. Would that work? We are generally free thereafter, so please suggest another later time if not.

Thank you,

Laura

Laura A. Menninger | Partner

Haddon, Morgan & Foreman, P.C.

150 E. 10th Avenue | Denver, CO 80203

+1 303 831 7364 (Office)

lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>

Sent: Tuesday, March 9, 2021 8:36 AM

To: Laura Menninger <lmenninger@hmflaw.com>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]> (USANYS) <[REDACTED]>

Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP (ceverdell@cohengresser.com) <ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>

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Good morning,

It would be helpful to have a call to discuss the requests contained in this letter. Are there times tomorrow when you would be available to speak, please?

Thank you,

[REDACTED]
Assistant United States Attorney
Southern District of New York
1 St. Andrew's Plaza
New York, NY 10007
[REDACTED]
[REDACTED]

From: Laura Menninger <lmenninger@hmflaw.com>

Sent: Monday, March 8, 2021 2:03 PM

EFTA00025198

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED]
(USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliuca@hmflaw.com>; Christian R Everdell - Cohen & Gresser LLP <ceverdell@cohengresser.com>
<ceverdell@cohengresser.com>; 'BOBBI C STERNHEIM' <bcsternheim@mac.com>
Subject: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

Counsel –

Please see attached correspondence.

-Laura



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