

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

**To:** Christian Everdell <CEverdell@CohenGresser.com>

**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "Mark S. Cohen" <mcohen@CohenGresser.com>, "Laura Menninger" <lmenninger@hmflaw.com>, Jeff Pagliuca <jpagliuca@hmflaw.com>, "Bobbi Sternheim (bcsternheim@mac.com)" <bcsternheim@mac.com>

**Subject:** RE: US v. Maxwell - discovery production

**Date:** Tue, 20 Oct 2020 13:49:25 +0000

**Attachments:** 2020.10.20\_Maxwell\_Discovery\_Letter.pdf

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Chris,

Your drive is ready for pickup at 1 St. Andrews, and Ms. Maxwell's drive has been sent to the MDC. Attached please find the accompanying letter.

Best,

[REDACTED]

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

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**From:** [REDACTED]

**Sent:** Monday, October 19, 2020 5:47 PM

**To:** Christian Everdell <CEverdell@CohenGresser.com>

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; Mark S. Cohen <mcohen@CohenGresser.com>; Laura Menninger <lmenninger@hmflaw.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>; Bobbi Sternheim (bcsternheim@mac.com) <bcsternheim@mac.com>

**Subject:** RE: US v. Maxwell - discovery production

Chris,

We have received the drives, thank you. They are being loaded, and I will let you know when yours is ready for pickup and when your client's has been sent to the MDC.

I will have the agents plan for Friday from 8am to 3pm.

Best,

[REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York

EFTA00025508

1 St. Andrew's Plaza  
New York, NY 10007

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**From:** Christian Everdell <[CEverdell@CohenGresser.com](mailto:CEverdell@CohenGresser.com)>

**Sent:** Monday, October 19, 2020 1:33 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; Mark S. Cohen <[mcohen@CohenGresser.com](mailto:mcohen@CohenGresser.com)>; Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>; Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>; Bobbi Sternheim (<[bcsternheim@mac.com](mailto:bcsternheim@mac.com)> <[bcsternheim@mac.com](mailto:bcsternheim@mac.com)>)

**Subject:** RE: US v. Maxwell - discovery production

[REDACTED] —

The hard drives were delivered just after 1pm. Please confirm receipt.

Also, we have asked for a prison visit from 8am-3pm on Friday for the review of the secure laptop. I will let you know when we receive confirmation. Please have the agents plan for Friday.

Thanks,

Chris

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**From:** [REDACTED] (<[mailto:\[REDACTED\]](mailto:[REDACTED])>)

**Sent:** Sunday, October 18, 2020 11:34 PM

**To:** Christian Everdell

**Cc:** [REDACTED]; [REDACTED] (USANYS); Mark S. Cohen; Laura Menninger; Jeff Pagliuca; Bobbi Sternheim (<[bcsternheim@mac.com](mailto:bcsternheim@mac.com)>)

**Subject:** RE: US v. Maxwell - discovery production

Chris,

Thanks very much, I'll be in the office and available to receive the drives.

The agents can make themselves available Thursday or Friday. Please let me know what date and time you end up scheduling with the MDC.

Best,

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**From:** Christian Everdell <[CEverdell@CohenGresser.com](mailto:CEverdell@CohenGresser.com)>

**Sent:** Sunday, October 18, 2020 10:47 PM

**To:** [REDACTED] <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; Mark S. Cohen <[mcohen@CohenGresser.com](mailto:mcohen@CohenGresser.com)>; Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>; Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>; Bobbi Sternheim (<[bcsternheim@mac.com](mailto:bcsternheim@mac.com)> <[bcsternheim@mac.com](mailto:bcsternheim@mac.com)>)

**Subject:** Re: US v. Maxwell - discovery production

[REDACTED] —

We will deliver two drives to you tomorrow. I will let you know when the drives have been dropped off.

EFTA00025509

Also, we are going to have to move the day that Ms. Maxwell reviews the secure laptop until later in the week. Are the agents free on Thursday or Friday?

Sent from my iPhone

On Oct 18, 2020, at 12:33 PM, [REDACTED] <[REDACTED]> wrote:

Chris,

We expect to have another discovery production ready to load tomorrow, October 19, 2020. Would you please provide us with two more drives (one for you and one for your client) onto which we can load the production?

Thank you,

[REDACTED]

[REDACTED]

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

[REDACTED]

[REDACTED]