

**From:**

**To:**

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

**Date:** Thu, 13 Aug 2020 21:07:08 +0000

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Of course! Thank you for answering a million questions.

**From:** [REDACTED] >

**Sent:** Thursday, August 13, 2020 5:06 PM

**To:**

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

Thank you so much for handling!!

**From:**

**Sent:** Thursday, August 13, 2020 5:06 PM

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

I just sent the next round of discovery via FedEx. The password for this drive is [REDACTED] We also sent a letter with the password in a separate envelope.

Please let us know when it arrives.

Thank you,

**From:**

**Sent:** Monday, August 10, 2020 6:03 PM

**Subject:** Re: delivery of hard drive to MDC for discovery production to inmate

That should be enough to track it down, thank you! If I have any issues, I'll let you know.

Best,

>>>

8/10/2020 5:59 PM >>>

I sent this via FedEx. When I enter the tracking number it says:

Delivered

Friday 8/07/2020 at 7:16 am

EFTA00026713

Let us know if you have any other questions.

Thanks!

[REDACTED]  
Sent from my iPhone

On Aug 10, 2020, at 5:48 PM, [REDACTED] wrote:

Good evening [REDACTED]

Just confirming - did you use FedEx, USPS, or some other carrier to send the discovery here? I have not received it yet, but it could just be that staff did not notify me a package arrived. Depending on the carrier, it could be in the warehouse or mailroom, so I just want to verify so I can find it expeditiously.

Thanks!

[REDACTED] 8/5/2020 7:13 PM >>>

That's extremely helpful, thanks so much. We'll plan to put the drive in the mail tomorrow, and of course please let us know if any issues arise.

thanks again,

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From: [REDACTED]  
Sent: Wednesday, August 05, 2020 19:05

[REDACTED]

**Subject:** RE: delivery of hard drive to MDC for discovery production to inmate

[REDACTED] Hard drives should be mailed to the facility to the attention of the legal department. We need to etch the drive with a number and provide an authorization memo so she can retain it. Then it will be provided to her. It can be password protected so long as you include a cover letter that contains the password for her.

Hope this helps,

[REDACTED] 8/5/2020 4:34 PM >>>

[REDACTED] We have a hard drive with loaded discovery that we need to deliver to Ghislaine Maxwell, [REDACTED] at MDC. Could you please let us know what the current protocol is for that? Also, it's our understanding that hard drives with discovery materials for inmates needs to be non-encrypted (and not have a password for access), is that also correct?

We're hoping to get these materials to her tomorrow if at all possible, so we greatly appreciate your help. And I'm reachable any time at [REDACTED] if it would be helpful to discuss.

thanks,

[REDACTED]  
Assistant U.S. Attorney  
Southern District of New York

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