

From: "████████ (USANYS) [Contractor]" <████████>
To: "████████)" <████████>
Cc: "████████)" <████████>, "████████ (USANYS)"
<████████>

Subject: RE: Discovery Issues

Date: Mon, 29 Mar 2021 19:04:18 +0000

Inline-Images: image001.jpg; image002.jpg

Hello █████,

I will send this information to PAE and set up a time for a phone call.

Thank you.

████.

From: █████ <████████>
Sent: Monday, March 29, 2021 2:59 PM
To: █████ (USANYS) [Contractor] <████████>
Cc: █████ <████████>; █████ (USANYS) <████████>
Subject: FW: Discovery Issues

Hi █████,

We just received the below and attached regarding discovery in the Maxwell case. Many of these questions relate to productions that PAE prepared. Would you please take a look and let me know when would be a good time this week for a call to discuss?

Thanks,

████

From: Christian Everdell <████████>
Sent: Monday, March 29, 2021 2:40 PM
To: █████ <████████>; █████ <████████>; █████ (USANYS) <████████>
Cc: 'Jeff Pagliuca' <████████>; Laura Menninger <████████>; Bobbi Sternheim <████████>
Subject: Discovery Issues

████, █████ and █████ -

We write to raise a few issues concerning the discovery. Below is the list of items. Please let me know if you are free for a call to discuss.

1. On our last call, we asked you if we could send our client a hard drive containing the discovery that we had created (without the highly confidential items). You had said you would check to see if you could facilitate this. We have not heard back from you. Are you able to send Ms. Maxwell the hard drive?
2. The last two productions you sent to Ms. Maxwell on disks. As you know, she cannot read disks on her laptop and must use the prison computer. But the prison computer cannot read some of the files. We can include these files

on our hard drive to send to Ms. Maxwell. Otherwise, you will need to produce them on a hard drive. Please advise which way you would like to proceed.

3. A number of the emails in the discovery – over 109,000 – were produced without their attachments (see tab 1 of the attached Excel file). Instead, the attachments appear as slip-sheets (see example attached). Please provide the missing attachments, if they exist.
4. A number of electronic documents – over 110,000 – that were extracted from one of Epstein’s devices, as identified by a CART number, have metadata that indicates a “date created” or “date last modified” date in July 2020 or afterwards (see tab 2 of the attached Excel file). We request that you produce a metadata overlay with the original metadata for these files.
5. A number of photographs – over 6500 – were produced in native format, but do not have a CART number and have “date created” and/or “date last modified” dates after July 2019 (see tab 3 of the attached Excel file). Please provide the CART number for these photographs or specify which device they came from. Also, we request that you produce a metadata overlay with the original metadata for these files.
6. A number of the audio/visual files – over 460 – have similar metadata issues (see tab 4 of the attached Excel file). These fall into the following buckets:
 - a. SDNY_GM_SUPP: these have CART numbers, but were produced without metadata load files and have “date created” and “date last modified” dates in September-November 2020, after the date the device was seized. We request that you produce a metadata overlay with the original metadata for these files.
 - b. SDNY005 (October 20, 2020 production): these are a few videos from the SDFL or PBPD investigations that were produced in native form without metadata load files. They have Sept-Oct 2020 dates. We request that you produce a metadata overlay with the original metadata for these files.
 - c. SDNY011 (November 9, 2020 production): these were produced in native form with load files, but do not reference a CART number and have Sept 2020 dates. We request that you provide a CART number for these files or indicate their source. Also, we request that you produce a metadata overlay with the original metadata for these files.
7. There is a gap between 11/18 and 12/18 production numbers (SDNY_GM_02742044 to 2742183). Was that intentional or are we missing those documents?

Please let us know your responses as soon as possible.

Thanks,

Chris

Christian R Everdell

COHEN & GRESSER LLP

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