

From:

To:

Cc:

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

Date: Thu, 13 Aug 2020 21:26:20 +0000

That makes sense to me, thanks.

From:

Sent: Thursday, August 13, 2020 5:19 PM

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

That is okay with me! I agree it is better.

I will make sure to do that moving forward. So far it has been easy to upload/not too large.

From:

Sent:

To:

Cc:

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

Can I make a small suggestion on this? Unless and until it gets super inconvenient to do this in terms of upload time, I'd suggest putting *all* the current discovery on whatever disk we send to the prison, like USAO_GM_000001 through whatever is the latest production, and then having the facility send back whatever is the last disc we sent after the new one arrives.

That way at any time there are only two disks out in the world with her discovery on them (the one she has at any given time, and the one that's on its way to replace it), and only one in her possession at all times. Otherwise in two months she's going to have a half dozen hard drives sitting in the MDC, with all different stuff on each one. But per usual anybody should weigh in if anyone disagrees!

From:

Sent: Thursday, August 13, 2020 17:06

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

Please let us know when it arrives.

EFTA00030906

Thank you,

From: [REDACTED]
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,

>>> [REDACTED] 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

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,

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

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

EFTA00030907

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,

8/5/2020 4:34 PM >>>

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.

Assistant U.S. Attorney
Southern District of New York