

From: "[REDACTED]" <[REDACTED]>
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
Date: Mon, 15 Mar 2021 21:59:40 +0000
Inline-Images: image001.jpg

Laura,

I expect to be able to answer all of your questions about the evidence review by tomorrow.

We have been looking into the discovery request you made last week, and we hope to have a response ready to provide to you by next week.

Best,
[REDACTED]

[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 15, 2021 3:01 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [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>
Subject: RE: US v. Maxwell - 20 Cr. 330 (AJN) - Request to view evidence, highly confidential materials, scenes

[REDACTED] -

Now that the FBI team is back, when do you expect to have answers to all of the questions posed? If I had an idea of when you would have answers, it could help me answer your question.

At a minimum, it would not seem to take too much time to know when someone can open the FBI vault and allow the attorneys to make an initial view of the evidence. Also, I understand the FBI did not prepare an inventory of their evidence when they seized it from NY and LSJ, so I don't think we need to wait for them to now prepare an inventory before we start reviewing evidence.

Also, when do you believe you will have a response regarding the discovery I requested last Monday?

Thanks,
Laura

Laura A. Menninger | Partner
Haddon, Morgan & Foreman, P.C.
150 E. 10th Avenue | Denver, CO 80203
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lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>
Sent: Friday, March 12, 2021 11:44 AM
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,

The FBI team on this case has been out of the office this week and will not be able to answer all of the questions you asked during our Wednesday call until they are back in the office next week. Please let me know if you would like to wait until all of those questions can be answered to schedule a day for your client to be brought to 500 Pearl Street to review the highly confidential images. My understanding is that the FBI is able to provide at least one laptop containing those highly confidential images in time for such a review to take place on Thursday 5/18, but I may not have the answers to all of your questions about those images before that date, and I do not know whether you will also be able to visit the evidence vault that same week.

Please let me know how you would like to proceed. I will reach back out once I have answers to your questions.

Thank you,

[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 4:56 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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That is the only excel spreadsheet indexing physical evidence that we have produced in discovery. That spreadsheet does not include every physical item currently in the FBI's custody related to this case. For example, the August 20, 2020

discovery production 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 (see Bates range SDNY_GM_00166007-SDNY_GM_00166043), 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 compile such an index.

Best,

[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: Tuesday, March 9, 2021 3:44 PM

To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [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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Thank you. Is that the only index of physical evidence available?

Laura A. Menninger | Partner
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From: [REDACTED] <[REDACTED]>

Sent: Tuesday, March 9, 2021 1:38 PM

To: Laura Menninger <lmenninger@hmflaw.com>; [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>

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 <jpagliariuca@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,
[REDACTED]

From: Laura Menninger <lmenninger@hmflaw.com>
Sent: Tuesday, March 9, 2021 11:19 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: Jeff Pagliuca <jpagliariuca@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
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lmenninger@hmflaw.com

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, March 9, 2021 8:36 AM
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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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]

[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

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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