

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: Laura Menninger <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, Jeff Pagliuca <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS) [Contractor]" <[REDACTED]>

Subject: RE: US v. Maxwell, 20 Cr. 330 (AJN)

Date: Sat, 20 Nov 2021 21:52:41 +0000

Attachments: 2021.11.20_Maxwell_Discovery_Letter_-_Corrected.pdf

Laura,

I'm attaching a corrected cover letter for the discovery production. The letter inadvertently listed SDNY_GM_02774195 instead of SDNY_GM_02774105. We have sent a hard drive to your office in Colorado (the FedEx tracking number is 8166 1429 9380). We have also sent a hard drive to your client at the MDC via FedEx. The tracking number for the drive is 8166 1445 3318, and the tracking number for the password is 8166 1445 3307. We are leaving a hard drive at our office for pickup under Chris's name.

We have uploaded the production except for SDNY_GM_02774100-SDNY_GM_02774104 to USAfx. We could not upload SDNY_GM_02774100-SDNY_GM_02774104 due to size limitations. The materials have been added to the same USAfx production folder [REDACTED] shared with you earlier today.

Thanks,

From: Laura Menninger <[REDACTED]>
Sent: Saturday, November 20, 2021 4:17 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED]; [REDACTED]; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Subject: [EXTERNAL] RE: US v. Maxwell, 20 Cr. 330 (AJN)

[REDACTED]:

A second question for you – the discovery letter appears to skip bates numbers 2774105-2774194.

Can you please confirm whether that was intentional or let us know what additional documents are contained in that range?

Thank you,
Laura

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Saturday, November 20, 2021 12:53 PM
To: [REDACTED]; [REDACTED]; Laura Menninger <[REDACTED]>; Jeff Pagliuca <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) [Contractor]

<[REDACTED]>

Subject: US v. Maxwell, 20 Cr. 330 (AJN)

Counsel,

We have an additional discovery production ready to send to you. Attached please find the accompanying cover letter. That will be produced on a hard drive to you. In addition, a supplemental production of testifying witness and non-testifying witness material and exhibits are also ready to send to you. Attached please find the accompanying cover letter and indices. Those materials will be on the hard drive as well. We will also produce the testifying witness and non-testifying witness material and exhibits via USAfx.

Please let us know if you would like to pick up the drive today or if you would like us to FedEx it (and if so, to where). Please let us know if you would like us to send today via FedEx a hard drive with these materials to Ms. Maxwell at the MDC or bring the hard drive to court on Tuesday.

Thanks,

[REDACTED]

[REDACTED]

Assistant United States Attorney
United States Attorney's Office
Southern District of New York

[REDACTED]

New York, New York 10007

Tel: [REDACTED]