

**From:** "[REDACTED] (USANYS)" <[REDACTED]>

**To:** "[REDACTED] (USANYS)" <[REDACTED]>

**Subject:** RE: Phone Call Follow-Up

**Date:** Fri, 30 Oct 2020 20:15:45 +0000

**Inline-Images:** image001.png

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Not good.

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**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Friday, October 30, 2020 2:45 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Subject:** FW: Phone Call Follow-Up

We will most likely not meet the November 9 deadline.

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**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Friday, October 30, 2020 2:41 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

**Subject:** RE: Phone Call Follow-Up

Thanks, [REDACTED]. The problem is the stuff that is coming today is stuff the team asked PAE to process in early September. I realize that this is a big project and that there's only so much that can be done, but it poses almost insurmountable timing hurdles for our team if it is taking 1-2 *months* for PAE to get us stuff we ask for out of Relativity. In most of our cases, this one included, that eats up a huge chunk of the time we have available to produce discovery.

We'll follow up early next week to see if there is a more concrete update, but I think this may require a broader or higher level explanation to the Court. I am concerned about requiring our team to take the hit with Judge Nathan for missing this deadline.

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**From:** [REDACTED] (USANYS) <[REDACTED]>

**Sent:** Friday, October 30, 2020 12:51 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

**Subject:** FW: Phone Call Follow-Up

Some of the data is being sent to use today by FedEx. However, there is a ton of stuff still being processed. That stuff is still being imaged. Then it gets marked. Then copied to us. I have spoken to [REDACTED]. He thinks it is not possible to meet the November 9 date. He thinks the next step might be done on Tuesday, and then a better estimate of completion might be possible.

[REDACTED]

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**From:** Koontz, Nicholas [US] <[REDACTED]>

**Sent:** Friday, October 30, 2020 12:25 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] (USANYS) [Contractor] <[REDACTED]>

**Subject:** Phone Call Follow-Up

Good Afternoon [REDACTED]:

Following up on our earlier phone conversation, a hard drive with the following productions is being sent to SDNY via FedEx with the following productions in the US v. Epstein workspace:

- 1) SDNYPROD008
- 2) SDNYPROD009
- 3) SDNYPROD010
- 4) SDNYPROD011 (Note: this is a six-part production)
- 5) SDNYPROD012
- 6) SDNYPROD013
- 7) SDNYPROD014

There are approximately 1.2 million records currently being imaged. The images will be available on Monday, November 2, 2020 at the earliest. The production of the records will begin as soon as the images are available in the workspace.

Please feel free to contact me if you have any questions.

Thanks,

Nick

**Nicholas D. Koontz**  
Lead E-Discovery Analyst

e. [REDACTED]  
[REDACTED]

Falls Church, Virginia 22043

**PAE**

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