

From: Christian Everdell <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, Jeff Pagliuca <[REDACTED]>, "Mark S. Cohen" <[REDACTED]>, "Laura Menninger" <[REDACTED]>, "Bobbi Sternheim ([REDACTED])" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>

Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

Date: Thu, 05 Nov 2020 22:58:30 +0000

Inline-Images: image001.jpg

Thanks, [REDACTED]. I will speak to you then.

From: [REDACTED] [mailto:[REDACTED]]
Sent: Thursday, November 05, 2020 5:20 PM
To: Christian Everdell; Jeff Pagliuca; Mark S. Cohen; Laura Menninger; Bobbi Sternheim ([REDACTED])
Cc: [REDACTED]; [REDACTED] (USANYS)
Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

Chris,

Yes, we are available for a call at 9am tomorrow morning to discuss. We can use the below dial-in:

Dial-in: [REDACTED]
Code: 707522

Thanks,
[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Christian Everdell <[REDACTED]>
Sent: Thursday, November 5, 2020 4:53 PM
To: [REDACTED] <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Mark S. Cohen <[REDACTED]>; Laura Menninger <[REDACTED]>; Bobbi Sternheim ([REDACTED]) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

[REDACTED] -

Can we have a call tomorrow morning to discuss? I am free before 9:30am.

EFTA00020821

Thanks,

Chris

From: [REDACTED] [mailto:[REDACTED]]
Sent: Thursday, November 05, 2020 1:57 PM
To: Jeff Pagliuca; Christian Everdell; Mark S. Cohen; Laura Menninger; Bobbi Sternheim ([REDACTED])
Cc: [REDACTED]; [REDACTED] (USANYS)
Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

Good afternoon,

Thank you for your response. The outside vendor is PAE, which maintains our office's Relativity database. The production at issue consists of documents extracted from numerous electronic devices seized from Jeffrey Epstein's residences in New York and the Virgin Islands, which were loaded onto Relativity for privilege and responsiveness review. On October 7, 2020, our office's filter team completed its privilege review of those documents. On October 21, 2020, the case team completed the responsiveness review and identified approximately 1.2 million documents as responsive. That same night, the case team asked PAE to prepare those approximately 1.2 million documents for production by imaging, bates stamping, and downloading the documents. We have repeatedly told PAE of the November 9th discovery deadline.

Yesterday, PAE informed us that it had finished imaging the production but would not be technologically able to finish bates stamping and downloading the production by November 9th. PAE has indicated that it expects to complete the production by November 19th, though it is making every effort to move as quickly as possible.

Best,

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: Jeff Pagliuca <[REDACTED]>
Sent: Thursday, November 5, 2020 1:42 PM
To: [REDACTED] <[REDACTED]>; Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>; Laura Menninger <[REDACTED]>; Bobbi Sternheim ([REDACTED]) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

Dear Ms. [REDACTED],

Because of ongoing difficulty with client calls and visitation we have not been able to adequately discuss the request. Also, it would be helpful for us to know the reason for the anticipated delay and the identity of the vendor.

Once we have had the opportunity to fully consider the request we will let you know our position.

EFTA00020822

Best regards,

Jeff Pagliuca



Jeffrey S. Pagliuca
Haddon, Morgan and Foreman, P.C.
[REDACTED]
[REDACTED]
[REDACTED].832.2628
[REDACTED]
www.hmflaw.com

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From: [REDACTED] <[REDACTED]>
Sent: Thursday, November 5, 2020 10:30 AM
To: Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>; Jeff Pagliuca <[REDACTED]>; Laura Menninger <[REDACTED]>; Bobbi Sternheim ([REDACTED]) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: US v. Maxwell - Request for Extension of Discovery Deadline

Good afternoon,

Following up on the below request, would you please let us know your position? I am available any time this afternoon if you would like to have a call to discuss. We are planning to file our request with the Court today.

Thank you,

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED]
Sent: Wednesday, November 4, 2020 5:10 PM
To: Christian Everdell <[REDACTED]>; Mark S. Cohen <[REDACTED]>; 'Jeff Pagliuca' <[REDACTED]>; Laura Menninger <[REDACTED]>; Bobbi Sternheim ([REDACTED]) <[REDACTED]>

EFTA00020823

Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Subject: US v. Maxwell - Request for Extension of Discovery Deadline

Counsel,

Today our outside vendor informed us that it will not be technologically possible for the vendor to finish processing the Government's final discovery production in this case by the November 9, 2020 deadline. The vendor has indicated that it expects to finish processing the production by November 19, 2020, at which point it will send the production to 1 St. Andrew's Plaza for us to conduct a spot check before providing it to you. Accordingly, we intend to ask the Court to extend the final discovery deadline, solely for the production of materials being processed by the vendor, by two weeks to November 23, 2020. We still expect to make a separate discovery production to you on November 9, 2020, and the only material that will be the subject of this extension request is that being processed by the vendor.

Would you please let us know your position on this extension request? We are also happy to have a phone call to discuss.

Best,

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]