

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>

Subject: RE: Phone Call Follow-Up

Date: Fri, 30 Oct 2020 18:54:08 +0000

Inline-Images: image001.png

Thanks, [REDACTED]. We appreciate the help. I know this has been a big headache and created a lot of problems not just for us but for a number of other units, and we really appreciate you trying to get us across the finish line.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, October 30, 2020 2:42 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Phone Call Follow-Up

Understood

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.

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]

From: [REDACTED] [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,



Lead E-Discovery Analyst

e.

7799 Leesburg Pike, Suite 300N
Falls Church, Virginia 22043

PAE

IMPORTANT: The information contained in this message may be privileged, business sensitive, proprietary, copyrighted, protected from disclosure and/or subject to US export controls. If you are not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify me immediately by replying to the message and deleting it from your computer. #-SEC-#