

- a. There is an overlap between the fourth and fifth document productions. The fourth production ends at SDNY_GM_00328863, the fifth production begins at SDNY_GM_00328070. We propose renumbering the range from the fifth production (i.e., renumber SDNY_GM_00328070-328863).
 - b. The metadata load files (*.DAT) for PROD011 had a number of gaps which are detailed in the attached Excel file. We propose that you send us a new DAT file covering only the missing documents.
 - c. The metadata load files (*.DAT) for PROD015 had a gap from SDNY_GM_00723971 to SDNY_GM_00723981. We propose that you send us a new DAT file covering only the missing documents.
7. To the extent that the government has created an index of the documents produced on November 9 and November 18 that is more detailed than the production cover letters, we request that you provide a copy to the defense.
 8. We request that the government provide copies of the grand jury subpoenas for documents issued by the government in this case. Also, please identify the date range of documents you requested in each subpoena.

There is one other issue we'd like to raise. An article in the Daily Beast on Monday referenced the search warrant affidavit for the cell-site simulator used to track Ms. Maxwell's cellphone before her arrest (<https://www.thedailybeast.com/how-the-fbi-tracked-down-ghislaine-maxwell-alleged-madam-of-jeffrey-epstein>). The article stated that the affidavit appeared in a "newly unsealed court filing." I don't recall this affidavit being unsealed or referenced in anything that was filed on the court docket. Please confirm whether or not the government unsealed this affidavit or any other materials from the criminal discovery, and whether any discovery materials were released pursuant to FOIA requests.

Regards,

Chris

Christian R Everdell

COHEN & GRESSER LLP



[view bio](#)

www.cohengresser.com

New York | Paris | Washington DC | London



CONFIDENTIALITY NOTICE: The information contained in this e-mail may be confidential and/or privileged. This e-mail is intended to be reviewed initially by only the individual named above. If the reader of this e-mail is not the intended recipient or a representative of the intended recipient, you are hereby notified that any review, dissemination or copying of this e-mail or the information contained herein is prohibited. If you have received this e-mail in error, please immediately notify the sender by telephone and permanently delete this e-mail. Thank you.

PRIVACY: A complete copy of our privacy policy can be viewed at: <https://www.cohengresser.com/privacy-policy>

EFTA00021708