

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

Subject: RE: GM FedEx Project

Date: Wed, 21 Jul 2021 19:32:20 +0000

Attachments: 2021.07.21_Maxwell_Discovery_Letter.docx

Hey [REDACTED],

Sounds good on those names. We will get this done after pushing out the 3500.

In looking at the FedEx documents we are pretty confident that they were never produced in discovery. I've [downloaded and stamped them](#), and drafted a [cover letter](#) (attached). Should these materials be stamped with the same text that [REDACTED] sent previously ("SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17")? If so, I'll add it to each of them.

There are also a number of additional materials that are saved in a pending production folder here:

[\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\Discovery\GM\27 Eighteenth Production \(2021-07-xx\)](\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\Discovery\GM\27 Eighteenth Production (2021-07-xx))

Are these materials good to be stamped as well or should we just produce the FedEx materials and wait on the rest?

Thanks,
[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, July 21, 2021 2:40 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: GM FedEx Project

Thanks so much for helping out with this project. As discussed, here are the names to look for:

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

As always, let us know if you have any questions.

Thanks,
[REDACTED]

EFTA00023043

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Monday, July 19, 2021 10:31 PM
To: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] (USANYS) [Contractor] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: GM FedEx Project

Hi everyone! I'm free any time on Wednesday, but I'm out on Thursday. Thanks!

[REDACTED]

Sent from my iPhone

On Jul 19, 2021, at 8:08 PM, [REDACTED] (USANYS) [Contractor] <[REDACTED]> wrote:

I'm also free the same times on Wednesday and all day on Thursday.

On Jul 19, 2021, at 8:03 PM, [REDACTED] (USANYS) [Contractor] <[REDACTED]> wrote:

Wednesday I'm available before 12:30 and after 2:30, and Thursday I'm available anytime in the afternoon (essentially anytime after we're done with defense's review of the stuff for [REDACTED]).

Sent from my iPhone

On Jul 19, 2021, at 7:55 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Hi paralegals extraordinaire,

Do you have a few minutes to speak about a project we were hoping you could work on for Maxwell? I'm pretty flexible Wednesday and Thursday if you guys want to confer and let me know some times that work for you for a call.

Thanks!

[REDACTED]

[REDACTED]
Assistant United States Attorney
United States Attorney's Office
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007
Tel: [REDACTED]