

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

Subject: RE: Defense Rule 16 Disclosure

Date: Thu, 11 Nov 2021 22:56:42 +0000

Attachments: 2021.11.08_Letter_to_Government_re_Rule_16_Disclosure.PDF

Thank you for doing this. The defense's November 8 letter (attached) lists a bunch of Government discovery in 12 subcategories. Could you please take a look at the letter and put copies of the bates numbers the defense has identified and put them in subfolders in the folder that [REDACTED] created (e.g., AT&T, Federal Express, etc). I added a subfolder as an example. Let me know if you have any questions.

Thanks!

From: [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Sent: Tuesday, November 9, 2021 12:51 PM
To: [REDACTED]
Cc: [REDACTED] (USANYS) [Contractor] [REDACTED] (USANYS)
[REDACTED] <[REDACTED]>
[REDACTED]
Subject: RE: Defense Rule 16 Disclosure

Thanks! Saved here: <\\Usa.doj.gov\\cloud\\NYS\\StAndrews\\Shared\\USvEpstein-2018R01618\\Discovery\\GM\\Defense Rule 16 Disclosures\\2021.11.08 Defense Rule 16 Disclosure>

From: [REDACTED]
Sent: Tuesday, November 9, 2021 12:44 PM
To: [REDACTED] (USANYS) [Contractor]
Cc: [REDACTED] (USANYS) [Contractor] [REDACTED] (USANYS)
[REDACTED] <[REDACTED]>
[REDACTED]
Subject: Re: Defense Rule 16 Disclosure

In the discovery folder. Thanks!

On Nov 9, 2021, at 12:25 PM, [REDACTED] (USANYS) [Contractor] [REDACTED] wrote:

Hi team – apologies for just getting to this now. Where on the shared would you like these saved? Thanks!

From: [REDACTED]
Sent: Monday, November 8, 2021 9:40 PM
To: [REDACTED] (USANYS) [Contractor] [REDACTED] (USANYS) [Contractor]
[REDACTED]
Cc: [REDACTED] (USANYS) [REDACTED] [REDACTED]

EFTA00028272

[REDACTED]
Subject: FW: Defense Rule 16 Disclosure

Hi [REDACTED]—could you please save these on the shared? Thanks!

From: Christian Everdell <[REDACTED]>

Sent: Monday, November 8, 2021 9:32 PM

To: [REDACTED]
(USANYS) [REDACTED]

Cc: Jeff Pagliuca <[REDACTED]> Laura Menninger [REDACTED]

Subject: [EXTERNAL] Defense Rule 16 Disclosure

[REDACTED] and [REDACTED]—

Attached is the defense Rule 16 disclosure.

Regards,

Chris

Christian R Everdell

<image001.gif>

[REDACTED]
[view bio](#)
www.cohengresser.com

New York | Paris | Washington DC | London <image002.jpg>

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