

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: Re: laptop for MDC
Date: Mon, 02 Nov 2020 17:19:57 +0000

Hi [REDACTED],

Hope you're doing well. Has the laptop arrived? The warden has approved our request to give the defendant this laptop, and we would like to have it ready by the end of the week if at all possible. If you have any questions, I can be reached at [REDACTED] anytime today. Thanks so much for your help with this project.

Best,

[REDACTED]

Sent from my iPhone

On Oct 28, 2020, at 2:44 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

It sure we will research one tonight and place the order tomorrow. It depends on availability and delivery. Do we have a copy of the data that goes with the drive?
Also with the ever changing policies in BOP, can you confirm that they will allow her to have a laptop. Not sure the rules at MDC.

Sent from my iPhone

On Oct 28, 2020, at 2:22 PM, [REDACTED] <[REDACTED]> wrote:

Perfect, thanks so much. How long would you estimate that will take?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 28, 2020 2:20 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

We will spec out a laptop to purchase for this case.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, October 28, 2020 2:09 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

Thanks so much.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, October 28, 2020 2:06 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: laptop for MDC

Let me discuss with Ed the best options. get back to you shortly.

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, October 28, 2020 1:58 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: laptop for MDC

Hi [REDACTED],

I hope you're doing well. Because of some discovery accessibility issues we're having in the Ghislaine Maxwell case, we would like to provide a clean laptop to Maxwell in MDC for discovery review purposes. The laptop need only permit review of standard files – word, pdf, .tif, .xls, etc. All other capabilities and programs can be disabled. I understand we did something similar in the Avenatti case, and [REDACTED] like to do the same here. Would that be possible? It would be a huge help to us if you could possibly prep and provide us with a laptop for this purpose.

Thanks so much—

[REDACTED]