

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: PAE and Litigation priorities  
**Date:** Wed, 14 Oct 2020 14:25:58 +0000

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[REDACTED]  
The PAE issue of case prioritization seems to be getting worse and we wanted to get your thoughts. The [REDACTED] was put on the priority list back in September but the team is unfortunately now back to getting the answer from PAE/database managers that there are only 2 priority cases that is taking up all of the PAE resources, Epstein and 377 Union Street. The [REDACTED] team sent search warrant returns to PAE on 9/22 and followed up yesterday to see if there was any ETA on getting them loaded and were told no. I completely understand that not all jobs can be a rush job but am hopeful that we can find a way for some of the PAE bandwidth to be reserved to load data in the normal course. If there could be a set expectation in terms of a timeline by which PAE is expected to load data in the normal course, I think that would be helpful guidance for us to provide to our unit so they can plan accordingly.

Happy to discuss.

Thanks,

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**From:** [REDACTED]  
**Sent:** Friday, September 11, 2020 1:47 PM  
**To:** [REDACTED]

**Subject:** Fwd: PAE and Litigation priorities  
Another

Sent from my iPad

Begin forwarded message:

**From:** [REDACTED]  
**Date:** August 28, 2020 at 10:24:45 AM EDT  
**To:** [REDACTED]  
**Subject:** Re: PAE and Litigation priorities

Yes, of course.

On Aug 28, 2020, at 10:02 AM, [REDACTED] wrote:

[REDACTED]  
Can we chat on Monday. PAE is looking to us to help them set priorities. As you can see [REDACTED] has hounded them and now 377 Union Street is their number one priority. [REDACTED] also hounds them. Between the two, they monopolize IT/Litigation Support to the detriment of other AUSAs.  
Sorry to bother you on vacation. Hope it has been restful.

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**From:** [REDACTED]  
**Sent:** Friday, August 28, 2020 9:31 AM

To: [REDACTED]  
Cc: [REDACTED]

Subject: RE: PAE

[REDACTED] just met with [REDACTED] and in addition to the priorities listed below, we have a number of other cases that are hot as well. Currently 377 Union is the priority PAE is working on due to a proposed September production date set by the AUSA. Due to the data size and complexity, other requests are still being worked on by in a limit capacity mode. Grisel will reach out to PAE to get a sense of when they can address [REDACTED] request.

Also, are you available Monday morning to chat about PAE, requests and the updates to the meeting we held with the SDNY working committee.

PAE also mentioned there are other "hot" cases they're working on:

1. **We Build the Wall** [REDACTED] Data must be processed and uploaded to Relativity asap to begin privilege review
2. **Epstein** [REDACTED] Data must be processed and uploaded to Relativity asap to begin privilege review
3. **PPI** [REDACTED] AUSA mentioned to SDNY PM there's a court deadline.
4. **Keefe v US FDA** [REDACTED] court deadline to produce every 25<sup>th</sup> of the month
5. **US v Jain** [REDACTED] allegedly a deadline to produce by August 28th
6. **377 Union Street**: 5 HDs of mixed data. Duplicate data, issues with load files, data disorganized

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From: [REDACTED]

Sent: Thursday, August 27, 2020 2:59 PM

To: [REDACTED]

Subject: RE: PAE

Or starting them.

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From: [REDACTED]

Sent: Thursday, August 27, 2020 2:59 PM

To: [REDACTED]

Subject: RE: PAE

Well, she's always putting out fires

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From: [REDACTED]

Sent: Thursday, August 27, 2020 2:54 PM

To: [REDACTED]

Subject: FW: PAE

[REDACTED]  
It is always a fire drill with her. Always [REDACTED] will have [REDACTED] call PAE tomorrow to determine if there is a problem there or here.

Ed

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From: [REDACTED]

Sent: Thursday, August 27, 2020 2:52 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: PAE

[REDACTED]  
PAE is taking much longer to respond to my requests to move potentially privileged documents out of databases; weeks instead of days, which is affecting the ability of AUSAs to access their evidence in a number of investigations and prosecutions. Do you know what is causing the delays? And how long it is expected to continue? And if there is any way that I can assist, please let me know.

Thanks [REDACTED]

[REDACTED]  
Assistant United States Attorney  
Southern District of New York  
One St. Andrews Plaza, Room 929

New York, NY 10007

