

**From:** [REDACTED]

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Jeffrey Epstein devices - privilege review

**Date:** Mon, 05 Oct 2020 16:18:09 +0000

**Inline-Images:** image001.png; image002.png; image003.png; image004.png

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[REDACTED]  
Thanks very much for speaking earlier. I had a call with [REDACTED] and we figured out that several of these numbers are for computers whose drives were processed under a different NYC number, so the computers have no independent data that would have been loaded into Relativity.

That said, we confirmed that we are still missing data from the following NYC numbers, all of which should have some data that needs to be loaded to Relativity:

- NYC024342
- NYC024347
- NYC024351
- NYC024370
- NYC027908
- NYC027909
- NYC027910
- NYC027913

Looking more closely at the numbers on the screenshot you sent, I see several numbers that do not appear on the FBI's spreadsheet at all. Those are:

- NYC029708
- NYC029710
- NYC029711
- NYC029713

Is it possible the "9" and "7" in those numbers got flipped? Because the FBI's spreadsheet does have NYC027908, NYC027910, NYC027911, and NYC027913. That number switch would account for three of the numbers on my first list.

Thanks,

[REDACTED]

**From:** [REDACTED]

**Sent:** Monday, October 5, 2020 11:14 AM

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: Jeffrey Epstein devices - privilege review

If you have a moment to talk please give me a call at [REDACTED]

Thank you.

[REDACTED]

**From:** [REDACTED]

**Sent:** Monday, October 5, 2020 11:11 AM

**Subject:** RE: Jeffrey Epstein devices - privilege review

Thanks very much, [REDACTED]

It looks like this list is missing the following NYC numbers, which the FBI indicated in the attached spreadsheet were produced to SDNY on July 23, 2020. Any idea where these might be?

- NYC024342
- NYC024347
- NYC024351
- NYC024367
- NYC024370
- NYC024385
- NYC024387
- NYC024389
- NYC024391
- NYC024393
- NYC027908
- NYC027909
- NYC027910
- NYC027913

Happy to get on a call if that would be useful.

Thanks again,

**From:** [REDACTED]

**Sent:** Monday, October 5, 2020 9:27 AM

**Subject:** RE: Jeffrey Epstein devices - privilege review

Good Morning,

Here is the screenshot you requested:



USvE\_20200728

NYC024321

NYC024323

NYC024324

NYC024326

NYC024327

NYC024328

NYC024329

NYC024334

NYC024336

NYC024337

NYC024339

NYC024340

NYC024341

NYC024343

NYC024344

NYC024345

NYC024346

NYC024348

NYC024349

NYC024350

NYC024353

NYC024354

NYC024355

NYC024362

NYC024363

NYC024364

NYC024365

- + NYC024368
- + NYC024371
- + NYC024383
- + NYC024386
- + NYC024388
- + NYC024390
- + NYC024392
- + NYC024394
- + NYC029708
- + NYC029710
- + NYC029711
- + NYC029713

This is everything that I have received from the FBI. Everything that I got is now in Relativity secured for review. Thank you.

**From:** [REDACTED]  
**Sent:** Sunday, October 4, 2020 8:16 PM

**Subject:** RE: Jeffrey Epstein devices - privilege review

Thanks so much [REDACTED]  
[REDACTED] would you please send us a screenshot of the full list of NYC numbers in the US v Epstein (SW Returns) database on Relativity when you have a chance tomorrow?

**From:** [REDACTED]  
**Sent:** Sunday, October 4, 2020 7:10 PM

**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: Jeffrey Epstein devices - privilege review

I'm sorry, a brief addition – I just realized that I also have this email from [REDACTED] from 8/13, so it very well may be that the subsequent email referenced below was just a partial screen shot. I'm not sure! But we should be able to tell one way or the other once [REDACTED] can let us know.

**From:** [REDACTED]  
**Sent:** Sunday, October 04, 2020 19:09

**To:** [REDACTED]  
**Cc:** [REDACTED]

**Subject:** RE: Jeffrey Epstein devices - privilege review

Hey, it's no bother, but I don't actually think I was involved when the uploading of the search warrant devices was completed – or at least, I don't have any record of being notified that all of the devices were ready for review on Relativity on August 27. I think I definitely didn't know that as of September 7-9, when we (the full team) corresponded with and (me and you) spoke to [REDACTED] because my understanding then was that we were talking then about where the devices would be foldered in Relativity once they were all loaded. The last email of the chain of which is attached here, and I'm copying in [REDACTED] and [REDACTED] so everybody is in the loop. (I don't believe I have any other emails to or from [REDACTED] since then on this particular issue.)

At the time of those discussions in September, I had thought only that five of the devices had been uploaded to Relativity (or four, depending on whether "NYC024369" and "NYC024369\_1" are different devices). [REDACTED] had emailed the team that those devices were on Relativity, via screen shot, on August 27 – that message is itself attached to my email attached here. So although I don't have any reason to doubt it, I don't think I personally know if the extractions from all devices were uploaded to Relativity and ready for privilege review as of August 27th.

All that said, the basic answer to your question is that I can't confirm what devices were or were not uploaded to Relativity because we can't see what has been loaded – because it's walled off for the privilege review. I think the way to confirm that would be for [REDACTED] to send a screen shot or list of all the NYC-numbered items that have been uploaded to Relativity, and to compare those numbers against the spreadsheet you created for the devices (and/or the spreadsheet from [REDACTED] the most recent version of that that I have is also attached). Which should hopefully be relatively easy to do! Anybody should please let me know if that doesn't make sense, or if any questions, disagreements, or issues? And I'm happy to do whatever additional follow-up would be useful.

thanks,

[REDACTED]

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**From:** [REDACTED]

**Sent:** Thursday, October 01, 2020 21:08

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** FW: Jeffrey Epstein devices - privilege review

[REDACTED] very sorry to bother you with this, but would you be able to step in and help confirm that all of the devices from [REDACTED] have been loaded to Relativity? My understanding was that was all done before you transitioned fully off the case.

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**From:** [REDACTED]

**Sent:** Thursday, October 1, 2020 9:02 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** RE: Jeffrey Epstein devices - privilege review

Hi [REDACTED]

I'm well, thanks, hope you are too.

Thanks for the tracker. Are these devices all from Maxell or Epstein? If any are from Maxwell, can you send me a list of her known attorneys?

I'll take a look at the Apple extractions tomorrow and let you know how much data is on each and how long the review should take and how much help I'll need.

Unfortunately I did not know until I just got your email and tracker that data had been loaded onto Relativity. I usually get an email when data is loaded but I can't find one. I will run the terms as soon I can.

Thanks [REDACTED]

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**From:** [REDACTED]

**Sent:** Thursday, October 01, 2020 8:28 PM

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]

**Subject:** Jeffrey Epstein devices - privilege review

Hi [REDACTED]

Hope you're doing well. I wanted to check in on the privilege review for the devices seized from Jeffrey Epstein. For reference, attached is a search warrant tracker.

Our understanding is that you received the extractions from the Apple devices from the drive [REDACTED] sent you via FedEx on August 25th, and that the extractions from the remaining devices were uploaded to Relativity and ready for privilege review on August 27th. Our understanding is that you're using the attached privilege terms to complete the privilege review, but please let us know if there is anything more you need for the review.

Our discovery deadline for the Maxwell case is November 9<sup>th</sup>, so we are hoping that the privilege review can be completed early this month to allow time for a responsiveness review before we make productions.

Thanks so much for all of your help.

