

To: jeevacation@gmail.com[jeevacation@gmail.com]; Jeffrey Epstein[jeevacation@gmail.com]
From: drsra
Sent: Thur 1/20/2011 10:35:50 PM
Subject: Fw: Status

FYI

--- On **Thu, 1/20/11**, **Leanne Seibert** <leanne@trentsteele.com> wrote:

From: Leanne Seibert <[REDACTED]>
Subject: Status
To: "drsra@bellsouth.net" <[REDACTED]>
Date: Thursday, January 20, 2011, 1:21 PM

Mr. Steele asked me to give you an update on the status. We have confirmed that Joe Fiore works for Ocean Bank, in their Ft. Lauderdale branch. Since he no longer works for plaintiff, we will need to serve him with the subpoena for deposition directly. Prior to taking his deposition, however, we want the rest of the documents from National City Bank. We are serving an additional request for production for all of the underwriting documents relating to the loan. Additionally, we have requested that they provide all of the checks and deposit records for the bank account based on our prior request. If necessary, we will file a motion to compel but we need to attempt to resolve the matter without a motion first.

The judge signed the order of recusal. The hearing on the motion for summary judgment will most likely not go forward before a newly assigned judge. We are waiting until we have received notice of the new judge to decide how best to proceed in that regard. We should have that information by early next week.

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