

From: [REDACTED]

To: [REDACTED]

Subject: RE: protective order

Date: Tue, 23 Jul 2019 00:24:18 +0000

Attachments: 2019-07-22,_JE,_protective_order_for_discovery_(RMB).docx

I'm sorry for the delay, totally my fault for holding it up, but updated version attached – it's basically all cosmetic edits and slight additional protections, but take a look and see if I've gone astray. Or if either/both of you don't feel inclined to review, that's fine too, and either way once I get either your comments or thumbs up I'll send along to the chiefs.

From: [REDACTED]

Sent: Sunday, July 21, 2019 12:21

To: [REDACTED]

Subject: RE: protective order

Thanks very much for drafting. I lean in favor of allowing the defendant to review sensitive discovery material in the presence of counsel. Otherwise, we risk complaints from the defense team that they cannot adequately prepare their defense.

From: [REDACTED]

Sent: Sunday, July 21, 2019 12:14 PM

To: [REDACTED]

Subject: protective order

Team,

A draft protective order is saved here—let me know what you think:

<\\Usa.doj.gov\cloud\NYS\StAndrews\Shared\USvEpstein-2018R01618\Discovery\Protective Orders>

I highlighted one section in particular. The way it's drafted, those materials can't be shown to the defendant at all. We could keep that as it is, or modify it so that copies may be shown to the defendant during meetings w/ counsel but not left with him at MCC. There are upsides and downsides to both approaches. Open to hearing everyone's thoughts.

None of this is time sensitive, we can deal with this tomorrow. Hope everyone is having a good weekend—

[REDACTED]