

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

**Subject:** RE: draft response to Epstein defense preservation requests

**Date:** Wed, 07 Aug 2019 16:18:37 +0000

**Attachments:** 2019-07-26,\_JE,\_defense\_letter\_requesting\_preservation\_and\_production.pdf; 2019-08-01,\_JE,\_defense\_supplemental\_letter\_requesting\_preservation\_and\_production.pdf; 2019-08-01,\_JE,\_defense\_broad\_discovery\_request\_letter.pdf

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I'm finishing up some deadline trial stuff but can chat this afternoon – and meanwhile, just so everybody has all of them together, attached are the three discovery letters we've gotten from defense counsel. There are two somewhat shorter ones relating to the NPA specifically, and then one massive one that's much broader (and which we do not address in our initial response letter).

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**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, August 07, 2019 09:34  
**To:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: RE: draft response to Epstein defense preservation requests

I'm not sure I had previously seen the 8/1 supplemental request. Let me know if one of you has a moment to discuss.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Tuesday, August 6, 2019 3:01 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** RE: draft response to Epstein defense preservation requests

[REDACTED]

This has been in the works for a little while, due to various other things that have come up in the interim, but we didn't want it to get lost given the discovery motion schedule. The attached is based on our conversations with [REDACTED], including his email with suggested language for the prefatory language, and responds to the two attached defense letters. Happy to discuss anytime and to incorporate comments and suggestions.

thanks,

[REDACTED]  
Assistant U.S. Attorney  
Southern District of New York  
[REDACTED]