

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: Friendly subpoena to [REDACTED] attorney
Date: Fri, 26 Mar 2021 15:46:15 +0000

[REDACTED] did not mention any protective order that would preclude him from providing the agreement. I did not expressly ask, but I can confirm with [REDACTED].

Sure, I'm happy to change the request to just be the settlement agreement itself.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, March 26, 2021 9:39 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Friendly subpoena to [REDACTED] attorney

Thanks, [REDACTED]. Two follow up questions – first, I assume there is no protective order issue here we need to be mindful of? Second, in light of the ongoing litigation over the BSF subpoena – and given that we do seem to have some knowledge of what's in the file here and, indeed, we want a very specific thing from that file – is there are virtue to specifically asking for what we want in the rider, rather than doing our typical "all non-privileged documents..."

Happy to chat if that would be helpful, and this will also need to be approved by Audrey, so I'll give her a heads up that it's coming. But we should probably try to cut this before Monday if possible.

From: [REDACTED] <[REDACTED]>
Sent: Friday, March 26, 2021 12:39 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Friendly subpoena to [REDACTED] attorney

[REDACTED],

The Maxwell team would like to send the attached "friendly subpoena" to [REDACTED] attorney [REDACTED]. During our interviews in Florida, [REDACTED] informed me that he has a copy of the settlement agreement between [REDACTED] and Epstein, which resolved [REDACTED] 2009 civil suit against Epstein. [REDACTED] is willing to provide us with a copy of the agreement, but he indicated that he believes he needs a subpoena before he can do so. His firm has already provided us with copies of all other court filings and deposition transcripts from the civil case voluntarily. The settlement agreement resolving the case is relevant to our ongoing investigation into Maxwell's participation in the abuse of [REDACTED].

Happy to discuss.

Thanks,
[REDACTED]