

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** 2020.11.09 call w/ Kaplan Hecker re: Dawn Hughes  
**Date:** Mon, 09 Nov 2020 17:51:26 +0000

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[REDACTED]  
[REDACTED]  
[REDACTED]  
Mike Ferrara  
Alex Conlon

During a call with Alex Conlon and Mike Ferrara, we explained that we are considering retaining Dr. Dawn Hughes as an expert to testify about several concepts. We understand Dr. Hughes examined a plaintiff represented by KH, so we explained that we wanted to ask about scope of representation to see if this posed any issues we should consider. Mike and Alex explained:

- The plaintiff who was examined by Dr. Hughes is [REDACTED]. In connection with the evaluation, they provided Dr. Hughes with several documents relating to the case, including documents obtained from the government through a Touhy request. Dr. Hughes generated a report, and also communicated directly with Epstein's estate in connection with discussions about a resolution.
- Alex noted that [REDACTED] disclosed more to Dr. Hughes than she disclosed to the government during interviews, so there may be inconsistencies between our interview notes and what she disclosed to Dr. Hughes, as outlined in the report.
- Alex and Mike expressed concern about confidentiality for [REDACTED]. We explained that, if we retain Dr. Hughes and call her to testify, we would disclose to Maxwell's counsel that Dr. Hughes had examined an Epstein victim. We explained that we also intend to produce our interview notes/reports for [REDACTED] in connection with our expansive 3500 disclosures. We outlined the restrictions of the protective order currently in place.
- Mike asked us to let him know if Maxwell's defense counsel made any applications seeking [REDACTED] medical records or other sensitive materials, because they may wish to intervene.

We explained that we were considering options and would be in touch, and that we would keep the lines of communication open if we decided to retain Dr. Hughes and made any disclosures that might affect [REDACTED].

[REDACTED]  
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