

From: "[REDACTED]" <[REDACTED]>
To: Robert Glassman <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, Nathan Werksman <[REDACTED]>, Kevin Boyle <[REDACTED]>
Subject: RE: SDNY investigation
Date: Fri, 24 Jan 2020 08:44:36 +0000

Robert,

Apologies for the belated reply, it's been a crazy week for us, but we'd be happy to talk. We should be generally available tomorrow (Friday) until about 2 p.m. our time, or also early next week if that's easier.

thanks,
[REDACTED]

-----Original Message-----

From: Robert Glassman <[REDACTED]>
Sent: Wednesday, January 22, 2020 15:39
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; Kevin Boyle <[REDACTED]>
Subject: Re: SDNY investigation

Thanks [REDACTED] I ended up seeing these too.

Our judge is John Koeltl and the magistrate is Barbara Moses.

Moskowitz already reached out to us.

Is there a good time to chat?

Robert S. Glassman
Panish Shea & Boyle
psblaw.com

> On Jan 20, 2020, at 1:11 PM, [REDACTED] <[REDACTED]> wrote:

>

> Robert,

>

> Thanks very much for sending the complaint, we appreciate it. We'll try to keep an eye on the docket, but if you wouldn't mind letting us know when a judge is assigned, that would also be helpful. In terms of media, it was covered in the Daily News on Friday, here:

>

>

>

>

> And then picked up by the Post and other outlets on Saturday:

>
> [REDACTED]
> [REDACTED]
> [REDACTED]
> [REDACTED]

> thanks,
> [REDACTED]

> -----Original Message-----

> From: Robert Glassman <[REDACTED]>
> Sent: Friday, January 17, 2020 22:18
> To: [REDACTED] <[REDACTED]>
> Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
> Nathan Werksman <[REDACTED]>
> Subject: RE: SDNY investigation

> [REDACTED] sorry for not giving you a heads up on this. That was not my intent. Just been really busy with a couple of other big matters going on now. Please see attached. What media is picking it up? I don't see anything.

> Robert Glassman, Esq.
> Panish Shea & Boyle LLP
> [REDACTED] Los Angeles, CA 90025
> Tel: [REDACTED]
> Fax: [REDACTED]
> Email: [REDACTED]
> Web: [REDACTED]

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> -----Original Message-----

> From: [REDACTED] [mailto:[REDACTED]]
> Sent: Friday, January 17, 2020 4:52 PM
> To: Robert Glassman <[REDACTED]>
> Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;
> [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>
> Subject: RE: SDNY investigation

> Robert,

> Based on media reports today it looks like you filed the civil lawsuit? I don't think we realized that was imminent -- could we ask you to please send us a copy of the filing? I don't yet see it on PACER.

> thanks,

> [REDACTED]

>

> -----Original Message-----

> From: [REDACTED]

> Sent: Monday, December 30, 2019 22:28

> To: Robert Glassman <[REDACTED]>

> Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;

Nathan Werksman <[REDACTED]>

> Subject: RE: SDNY investigation

>

> Great, thanks very much. We'll likely start with siblings and mother and then go from there. As soon as we have a sense of when it would be productive for us to return for a follow-up meeting with [REDACTED], we'll reach out -- as I mentioned, we're hoping that will be sometime in January, but just depending on how quickly we're able to schedule these discussions. And as always, please don't hesitate to let us know if anything comes up in the meantime.

>

> [REDACTED]

>

>

> -----Original Message-----

> From: Robert Glassman <[REDACTED]>

> Sent: Monday, December 30, 2019 22:20

> To: [REDACTED] <[REDACTED]>

> Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>;

Nathan Werksman <[REDACTED]>

> Subject: Re: SDNY investigation

>

> [REDACTED] - yes, all good to contact those folks. Thanks for checking in.

>

>

> Robert S. Glassman

> Panish Shea & Boyle

> psblaw.com

>

>

>> On Dec 30, 2019, at 1:10 PM, [REDACTED] <[REDACTED]> wrote:

>>

>> Robert,

>>

>> Following up on our most recent meeting with you and [REDACTED] we wanted to confirm that it's alright for us to begin reaching out this week to the contacts she identified for us -- in particular, we would initially expect to contact [REDACTED] and [REDACTED] and then Howie Simon, [REDACTED], Dr. Cabe, and John Larkin. We also wanted to see if it we are able at this stage to contact her mother, who is potentially a key witness -- I know [REDACTED] had wanted to speak with her mother in advance of us doing that. Please let us know if it's alright to make those calls? And separately, if you could please let us know if her brother has happened to have any contact with [REDACTED] since we last spoke -- no problem at all if not, but I think she mentioned that was a possibility so wanted to check.

>>

>> Thanks very much, and hope you're having a good holiday season.

>>

>> thanks again,

>> [REDACTED]

>>

>>
>> -----Original Message-----
>> From: [REDACTED]
>> Sent: Friday, December 13, 2019 17:06
>> To: Robert Glassman <[REDACTED]>
>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; Nathan Werksman <[REDACTED]>
>> Subject: RE: SDNY investigation
>>
>> Totally understand, just wanted to ask. We'll see you Monday at 11:00. And thanks for that additional info as well.

>> [REDACTED]
>>
>> -----Original Message-----
>> From: Robert Glassman <[REDACTED]>
>> Sent: Friday, December 13, 2019 16:14
>> To: [REDACTED] <[REDACTED]>
>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; Nathan Werksman <[REDACTED]>
>> Subject: Re: SDNY investigation
>>
>> [REDACTED], unfortunately, we can't do earlier than 11. She just needs time to get to my office after taking care of kid stuff etc.
>> Re the mom, my understanding is that she is overseas somewhere. Pretty sure she's not in the US. I will find out and we can chat about it on Monday.

>>
>> Robert S. Glassman
>> Panish Shea & Boyle
>> psblaw.com
>>
>>

>>>> On Dec 12, 2019, at 1:30 PM, [REDACTED] <[REDACTED]>
wrote:

>>>> Robert,
>>>>
>>>> We wanted to ask if it might be possible to start at 10:00 on Monday rather than 11:00? If not, we totally understand (I think you may have wanted time to meet with her before starting with us) but wanted to check.

>>>> Separately, I know [REDACTED] left you a message earlier, but since we're emailing about this we can just ask -- we were wondering if it might be possible to tell us where [REDACTED] mother currently lives? Not her literal address, but just city and/or state -- we don't have any intention of contacting her before we speak to you and your client in person, but just for our longer-term logistical planning, we're wondering where we would be headed if and when an interview of her were to be appropriate.

>>>> thanks,
>>>> [REDACTED]
>>>>

>>>> -----Original Message-----
>>>> From: [REDACTED]
>>>> Sent: Wednesday, December 11, 2019 13:15
>>>> To: Robert Glassman <[REDACTED]>

>>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; Nathan Werksman <[REDACTED]>
>>> Subject: RE: SDNY investigation
>>>

>>> Confirmed, thanks -- we'll see you then. And just on substance, I think we mentioned these topics when we spoke on the phone earlier, but just to refresh, I expect we'll want to talk through some additional specifics on travel, we'll talk more about other steps we'll be looking to take in our investigation for corroboration and what the appropriate timing and format of that would be, and to start to talk about specific conduct by Epstein and/or Maxwell to whatever extent [REDACTED] is comfortable with that at this stage. And we'll also likely refresh on some other topics as well, but just to flag some of the more immediate areas we'll expect to cover. Let us know if it's useful to chat again before Monday, otherwise we'll see you then.

>>> thanks again,
>>> [REDACTED]
>>>
>>>

>>> -----Original Message-----

>>> From: Robert Glassman <[REDACTED]>
>>> Sent: Wednesday, December 11, 2019 12:38
>>> To: [REDACTED] <[REDACTED]>
>>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; Nathan Werksman <[REDACTED]>
>>> Subject: RE: SDNY investigation
>>>

>>> Let's do 11 a.m. on Monday.
>>>

>>> Robert Glassman, Esq.
>>> Panish Shea & Boyle LLP
>>> [REDACTED] Los Angeles, CA 90025
>>> Tel: [REDACTED]
>>> Fax: [REDACTED]
>>> Email: [REDACTED]
>>> Web: [REDACTED]
>>>

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>>>
>>>

>>> -----Original Message-----

>>> From: [REDACTED] [mailto:[REDACTED]]
>>> Sent: Wednesday, December 11, 2019 8:26 AM
>>> To: Robert Glassman <[REDACTED]>
>>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
<[REDACTED]>; Nathan Werksman <[REDACTED]>
>>> Subject: RE: SDNY investigation
>>>

>>> Robert,
>>>

>>> That's great, thanks very much. Do you have a preference on timing? Anytime that morning starting at 10:00 a.m. or later would be fine for us, or we could also start early afternoon if that's easier--whatever you and [REDACTED] prefer. And our hope is that we'd be able to cover everything on Monday, but we'll also be available on Tuesday if that ends up being useful as well.

>>>
>>> thanks,
>>> [REDACTED]

>>>
>>>

>>> -----Original Message-----

>>> From: Robert Glassman <[REDACTED]>
>>> Sent: Tuesday, December 10, 2019 20:59
>>> To: [REDACTED] <[REDACTED]>
>>> Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>
>>> Subject: Re: SDNY investigation

>>>
>>> Monday morning works at my office. Tuesday may also work too if you need more time. But confirm for Monday.

>>>
>>>
>>> Robert S. Glassman
>>> Panish Shea & Boyle
>>> psblaw.com

>>>
>>>>> On Dec 10, 2019, at 9:35 AM, [REDACTED] <[REDACTED]>
wrote:

>>>>>
>>>>> Robert,

>>>>> Following up on our call, in terms of logistics, we can come to California to meet with [REDACTED] anytime this coming Sunday, Monday, or Tuesday, if any of those work? Also, if it's at all possible to either set aside a significant amount of time on one day or--possibly preferably--a few hours on two consecutive days (and if so, we could do the second meeting on Wednesday if that's helpful), that will allow us to review relevant case notes, do quick research, or anything else that would provide for helpful follow-up where we'd just need a little time between discussion sessions. And as always, happy to discuss via phone if that's helpful.

>>>>>
>>>>> thanks,
>>>>> [REDACTED]

>>>>>
>>>>>

>>>>> -----Original Message-----

>>>>> From: [REDACTED]
>>>>> Sent: Monday, December 09, 2019 17:46
>>>>> To: Robert Glassman <[REDACTED]>
>>>>> Cc: [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; [REDACTED] <[REDACTED]>
>>>>> Subject: RE: SDNY investigation

>>>>>
>>>>> Thanks Robert -- we'll call you in 5-10 minutes, just gathering everybody up in the same place. Thanks very much.

>>>>>

>>>> -----Original Message-----

>>>> From: Robert Glassman <[REDACTED]>

>>>> Sent: Monday, December 09, 2019 17:34

>>>> To: [REDACTED] <[REDACTED]>

>>>> Cc: [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; [REDACTED] <[REDACTED]>

>>>> Subject: Re: SDNY investigation

>>>>

>>>> Yes. Call me on my cell today.

>>>>

>>>>

>>>>

>>>> Robert S. Glassman

>>>> Panish Shea & Boyle

>>>> psblaw.com

>>>>

>>>>

>>>>> On Dec 9, 2019, at 9:21 AM, [REDACTED] <[REDACTED]>

wrote:

>>>>>

>>>>> Robert,

>>>>>

>>>>> Checking in on the below -- is there a good time to chat this week?

>>>>>

>>>>> thanks,

>>>>> [REDACTED].

>>>>>

>>>>> -----Original Message-----

>>>>> From: [REDACTED]

>>>>> Sent: Wednesday, December 04, 2019 13:06

>>>>> To: Robert Glassman <[REDACTED]>

>>>>> Cc: [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; [REDACTED] <[REDACTED]>

>>>>> Subject: RE: SDNY investigation

>>>>>

>>>>> Hi Robert,

>>>>>

>>>>> Following up on our discussion a couple weeks ago, would it make sense to have a quick call later this week or early next to check in on current status? We also have one additional data point we'd like to convey as well, at your convenience.

>>>>>

>>>>> thanks,

>>>>> [REDACTED]

>>>>>

>>>>>

>>>>> -----Original Message-----

>>>>> From: Robert Glassman <[REDACTED]>

>>>>> Sent: Friday, November 22, 2019 13:51

>>>>> To: [REDACTED] <[REDACTED]>

>>>>> Cc: [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; [REDACTED] <[REDACTED]>

>>>>> Subject: Re: SDNY investigation

>>>>>

>>>>> Thanks. Cell is best [REDACTED]

>>>>>

>>>>>

>>>>>

>>>>> Robert S. Glassman
>>>>> Panish Shea & Boyle
>>>>> psblaw.com

>>>>>

>>>>>

>>>>>>> On Nov 22, 2019, at 10:14 AM, [REDACTED]

<[REDACTED]> wrote:

>>>>>>

>>>>>