

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

Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF
Date: Fri, 24 Jul 2020 23:12:26 +0000

[REDACTED]

Thanks very much, and this generally looks fine to me. Might it be possible to add the following before the "Please contact me" sentence:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

And the materials that [REDACTED] emailed at 3:06 this afternoon all look good to me, so everything should be ready to go once the letter is approved. If you wouldn't mind letting us know when you send everything out, that would be great.

thanks again,
[REDACTED]

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, July 24, 2020 00:07
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Thanks for adding [REDACTED] on this for the redactions, [REDACTED]. Please find attached the letter to go out with the docs. (Note that my supervisor is still looking at it.) Please let me know if you have any edits or concerns. I think last time we ran everything past [REDACTED] before it went out to the door. I planned to do that again, once the packet is ready to go. Thanks.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 23, 2020 6:14 PM
To: [REDACTED], [REDACTED] (USANYS) [Contractor] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Subject: FW: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

[REDACTED]

We have a redaction project we need help with, please – could you please take a look at the attachments included in the attached email? As described a couple emails below, they consist mostly of FedEx invoices, plus another few docs, that

need to be redacted for production based on a *Touhy* request. Would you be able to help out with that?

[REDACTED]

If you could please send the redacted versions to us and to [REDACTED] (copied here), we'll do a final review for production and then be all set.

thanks,

[REDACTED]

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, July 23, 2020 00:50
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Thanks, [REDACTED]. [REDACTED]. I should be able to turn a letter on this quickly. I think if it would be easy to have a paralegal do the redactions, that would be helpful and probably speed things up (it doesn't matter which side that happens on). Let me know if that would work, or I can also ask a paralegal on my side.

Thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, July 22, 2020 9:38 PM
To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

[REDACTED]

This is obviously now very belated, but as previewed earlier today, I've completed a review of our materials for documents responsive to this *Touhy* request. Unfortunately, and as discussed, many of the documents we have that would be otherwise responsive were obtained pursuant to grand jury subpoenas we issued. Based on your discussion with [REDACTED] I am not conveying those materials to you for review. What we're left with are the following, which are attached:

- 4 documents relating to FedEx invoices, obtained from the FOIA office in connection with its review of the Florida investigation file (note that there are actually 12 such documents in all, but the remainder are duplicative; please let us know if we should produce all 12 anyway, otherwise I've just given you the 4);
- 2 documents obtained through electronic search warrants; and
- 1 document, a photo, obtained through a physical search of Epstein's residence.

[REDACTED]

[REDACTED]

Given the small volume, if we can get it out quickly that would be fantastic, and please let us know if it would be helpful to have a paralegal do the redactions (not sure if you have to do that on your side, or if we can assist).

Please let us know if any questions at all, and thanks as always.

[REDACTED]

From: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, June 08, 2020 23:51
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: FW: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF
Importance: High

Hi all,

Will you be able to gather the responsive documents for Glassman's request, as with the request from Kaplan? Except for Item 8, this request seems fairly contained—and they have expressly cabined their request to not seek documents that would interfere with ongoing proceedings. Please let me know if we need to discuss. Otherwise, I'll draft a letter once we have the docs gathered (happy to do redactions again if helpful).

Thanks,

[REDACTED]

From: Robert Glassman <[REDACTED]>
Sent: Monday, June 8, 2020 3:08 PM
To: [REDACTED], [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; Nathan Werksman <[REDACTED]>; Keilah Betts <[REDACTED]>
Subject: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF
Importance: High

Dear Mr. [REDACTED],

Please see the attached letter of today's date. A copy will also be sent via Fedex. Thank you.

Robert Glassman

Robert Glassman, Esq.
Panish Shea & Boyle LLP
11111 Santa Monica Boulevard, Suite 700
Los Angeles, CA 90025

[REDACTED]
[REDACTED]
[REDACTED]
Web: www.psblaw.com

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