

**From:** "[REDACTED]" <[REDACTED]>

**To:** "Weinstein, Marc A." <[REDACTED]>

**Cc:** "Tomback, Andrew" <[REDACTED]>, [REDACTED]  
[REDACTED]

**Subject:** RE: Grand jury subpoena response

**Date:** Mon, 20 Jan 2020 18:56:04 +0000

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Received and understood, thank you.

[REDACTED].

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**From:** Weinstein, Marc A. <[REDACTED]>

**Sent:** Saturday, January 18, 2020 16:00

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

**Cc:** Tomback, Andrew <[REDACTED]>; [REDACTED]  
[REDACTED]

**Subject:** Re: Grand jury subpoena response

[REDACTED], we should be able to produce these by the middle of the week.

Have a good weekend,  
Marc

**Marc A. Weinstein** | Partner

Chair, White Collar Defense

**Hughes Hubbard & Reed LLP**

One Battery Park Plaza, 17th floor | New York, NY 10004-1482

Office [REDACTED]  
[REDACTED]

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On Jan 17, 2020, at 1:24 PM, [REDACTED] > wrote:

**CAUTION: This email was sent by someone outside of the Firm.**

Marc,

You're absolutely correct that our request was specifically for prior wills—my email below was the result of an incorrect recollection on my part, and I apologize for the suggestion that there might have been a mutual misunderstanding. I don't specifically recall the details of our discussion as to the trusts in particular, but having been reminded through our communications yesterday and today, I certainly remember that our request was for the wills specifically, and it is the case that the original directive we received was to request the wills. In any event, and regardless of the cause, the reference to a possible miscommunication was my mistake.

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In terms of going forward, and notwithstanding that I've also communicated to my supervisors that the oversight was mine, there is a tremendous interest in receiving the trusts expeditiously (in part because the production of the wills took a substantially longer time than we had anticipated). If at all possible, we are hoping to receive them early next week following the holiday—or if you think that is not possible, if you could please give us a sense of when we should expect them, I will pass that up our chain. Thank you for your consideration.

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**From:** Weinstein, Marc A. <[REDACTED]>

**Sent:** Friday, January 17, 2020 10:23

**To:** [REDACTED]

**Cc:** Tomback, Andrew <[REDACTED]>; [REDACTED]; [REDACTED]

**Subject:** RE: Grand jury subpoena response

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We will of course speak to our clients about the request. We thought it was quite clear in our call with you about the Office's request that it was specifically limited to prior wills, and not trusts. Indeed, we asked you to confirm that the request was so limited since it should be obvious to those investigating that the trusts are a necessary part of the overall sequence. You confirmed that the request was limited to the wills. So we then suggested that perhaps we should enlarge the request to cover the trusts and you said that the requester had clearly asked for just the wills and it was best to stick with that. We will get back to you as soon as possible on this additional request.

Best regards,  
Marc

**Marc A. Weinstein** | Partner  
Chair, White Collar Defense

**Hughes Hubbard & Reed LLP**

One Battery Park Plaza, 17th floor | New York, NY 10004-1482

Office [REDACTED]  
[REDACTED]

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**From:** [REDACTED]

**Sent:** Thursday, January 16, 2020 11:59 AM

**To:** Weinstein, Marc A. <[REDACTED]>

**Cc:** Tomback, Andrew <[REDACTED]>; [REDACTED]

**Subject:** RE: Grand jury subpoena response

**CAUTION: This email was sent by someone outside of the Firm.**

Marc,

Received, and thank you. For our records and awareness, does this complete your production of such materials relating to prior wills specifically, or do you expect to supplement with additional materials that exist but have not yet been

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gathered? I imagine it's likely the former, but wanted to confirm.

Separately, and I apologize if this was not communicated with sufficient clarity earlier, this request, similar to the prior one in connection with the most recent will, also is intended to encompass trusts referenced within the wills. At a glance, I believe that will include, but not necessarily be limited to, the trusts defined as the following in the documents you produced this morning:

- [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

Please let us know when you expect you will be able to produce those related materials?

thanks,

[REDACTED]

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**From:** Weinstein, Marc A. <[REDACTED]>

**Sent:** Thursday, January 16, 2020 11:20

**To:** [REDACTED]; [REDACTED]

**Cc:** Tomback, Andrew <[REDACTED]>

**Subject:** Grand jury subpoena response

[REDACTED], [REDACTED]:

In response to your request for any prior wills of Jeffrey Epstein, which request we understand was made pursuant to the October 18, 2019 grand jury subpoenas to the executors of the estate of Jeffrey Epstein, attached please find documents bearing Bates numbers GJ\_000103 through GJ\_000197.

Regards,  
Marc

**Marc A. Weinstein** | Partner

Chair, White Collar Defense

**Hughes Hubbard & Reed LLP**

One Battery Park Plaza, 17th floor | New York, NY 10004-1482

Office [REDACTED]  
[REDACTED]

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