

**From:** "[REDACTED], [REDACTED] (USANYS)" <[REDACTED]>  
**To:** "[REDACTED]" <[REDACTED]>, "[REDACTED], [REDACTED] (USANYS)" <[REDACTED]>  
**Cc:** "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** RE: Jeffrey Epstein-Related Touhy Requests  
**Date:** Thu, 10 Sep 2020 18:16:30 +0000

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Thanks, [REDACTED]. I will call Brad and tell him to submit a written request, without pseudonyms. Thanks, all.

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Thursday, September 10, 2020 2:13 PM  
**To:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: Jeffrey Epstein-Related Touhy Requests

Thanks all. We do not have any specifics for the request to address. And we do not believe that it is possible for us to accept this request under pseudonyms.

Thanks,  
[REDACTED]

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**From:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, September 9, 2020 7:00 PM  
**To:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: Jeffrey Epstein-Related Touhy Requests

Thanks, [REDACTED]. Sounds good. Once I hear from the *Maxwell* team re: any specifics for the request to address, I'll give Brad a call and tell him to submit a written request.

Thanks,  
[REDACTED]

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**From:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Wednesday, September 9, 2020 3:56 PM  
**To:** [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED], [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: Jeffrey Epstein-Related Touhy Requests

This string is a mile long so I'm going to truncate it.

I think at this point we need to ask Brad Evans to make a formal *Touhy* request, with specifics of what he wants, in connection with what proceeding, and naming names, so that we can know exactly what he wants and evaluate

it.

Criminals, anything in particular you would like Evans' *Touhy* request to address? You will have to consider (i) whether disclosing anything under the *Touhy* request would have an impact on your case; (ii) whether it would have any impact on any of your witnesses (e.g., sharing info with a wit as affecting the wit's credibility; sharing info with the wit for the wit's civil case as a disclosable benefit); and (iii) keep in mind that responding to the request is likely to involve a great deal of your time.

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