

**From:** "Kathleen E. Cassidy" [REDACTED]  
**To:** "[REDACTED]" <[REDACTED]>  
**Cc:** Susan Necheles [REDACTED], Susan Necheles <[REDACTED]>, [REDACTED] <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** RE: Submission on behalf of [REDACTED]  
**Date:** Tue, 24 Mar 2020 19:03:39 +0000  
**Attachments:** [REDACTED]

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We share with you the attached draft submission in anticipation of our call.

Thanks,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, March 24, 2020 12:51 PM  
**To:** Kathleen E. Cassidy [REDACTED]  
**Cc:** Susan Necheles [REDACTED]; Susan Necheles <[REDACTED]>, [REDACTED] <[REDACTED]>; [REDACTED]  
**Subject:** RE: Submission on behalf of [REDACTED]

That works for us, and thanks for sending the dial-in information. Talk with you then.

[REDACTED]

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**From:** Kathleen E. Cassidy [REDACTED]  
**Sent:** Tuesday, March 24, 2020 10:30  
**To:** [REDACTED]  
**Cc:** Susan Necheles [REDACTED]; Susan Necheles <[REDACTED]>, [REDACTED] <[REDACTED]>, [REDACTED] <[REDACTED]>  
**Subject:** Re: Submission on behalf of [REDACTED]

Can we do 5:30?

[REDACTED]

Passcode [REDACTED]#

Sent from my iPhone

On Mar 24, 2020, at 10:14 AM, [REDACTED] > wrote:

Susan,

We could talk anytime this afternoon between 12:00 and 2:00, if there's a time then that works? Or otherwise after 5:00. And if you're able to send a dial-in, that would be helpful, but let us know if not.

thanks,

[REDACTED]

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**From:** Susan Necheles [REDACTED]  
**Sent:** Monday, March 23, 2020 21:28  
**To:** [REDACTED] >  
**Cc:** Susan Necheles <[REDACTED]>; [REDACTED]  
[REDACTED]; Kathleen E. Cassidy [REDACTED]; [REDACTED]  
**Subject:** Re: Submission on behalf of [REDACTED]

Can we talk tomorrow afternoon? I hope to get you another draft in the morning.

Susan R. Necheles

Sent from my iPhone

On Mar 23, 2020, at 4:20 PM, [REDACTED] > wrote:

Susan,

We wanted to follow up on the below – we understand these are very unusual times but we’re continuing to move ahead with our internal decision-making discussions, and it would be very helpful to be able to incorporate your client’s proposal (if anything) in that process. It will be of particular use given the civil lawsuit Ms. [REDACTED] [REDACTED]; it is difficult for us to explain to our supervisors why she has been able to file a complaint but not to make a submission to our office. Would it be possible to schedule a call for tomorrow to discuss status? And separately we hope that you and your colleagues and families are weathering the current circumstances.

thanks,  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** Tuesday, March 17, 2020 16:16  
**To:** Susan Necheles [REDACTED]  
**Cc:** Susan Necheles <[REDACTED]>; [REDACTED]  
[REDACTED]; Kathleen E. Cassidy [REDACTED]; [REDACTED]  
**Subject:** Re: Submission on behalf of [REDACTED]

Susan — totally understand, and we appreciate you letting us know. That’s not a problem.

thanks,  
[REDACTED]

On Mar 17, 2020, at 15:46, Susan Necheles <[REDACTED]> wrote:

[REDACTED],

I am working on the new draft of this submission but it is going slower than I expected. [REDACTED] has been in an emotionally and psychologically fragile state, and because of the Coronavirus, we cannot get her the proper therapy which she needs. We have suggested she go back to [REDACTED] so at least she can be in her home and not shut up in a stranger’s apartment here in NYC. Additionally, we attorneys have all shut our offices and are working at home, leading to a great loss in productivity.

So, realistically I am hoping to get you the new draft tomorrow afternoon.

Susan R. Necheles

Sent from my iPhone

On Mar 12, 2020, at 8:49 PM, [REDACTED] wrote:

Confirming receipt, thanks.

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**From:** Susan Necheles (via Google Docs) <[REDACTED]>  
**Sent:** Thursday, March 12, 2020 20:40  
**To:** [REDACTED]  
**Cc:** [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]  
**Subject:** Submission on behalf of [REDACTED]

[REDACTED] has shared a link to the following document:

<~WRD178.jpg>

[Submission on behalf of \[REDACTED\]](#)

<image001.jpg>

Attached is a draft of the factual statement, just so that you can better understand the facts that we are presenting.

We feel that given [REDACTED] abuse, and given the fact that we see her basically as a cog in Epstein's wheel, acting entirely at his direction and doing what she did at a time that she herself was a very vulnerable victim, a non-pros would be the appropriate disposition. But we want to discuss this with you before we finalize this and make a submission.

Thanks, Susan

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[<~WRD178.jpg>](#)