

From: Kevin Boyle <[REDACTED]>
To: Robert Glassman <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, Nathan Werksman <[REDACTED]>
Subject: Re: SDNY investigation
Date: Wed, 12 Feb 2020 16:58:56 +0000

Also all—

No objection that I can see from ud regarding these subpoenas (without having see. them), but note that some states (CA at least, in civil cases) a “Notice to Consumer” must be done with subpoenas like this. If it is not done, then the entity can not produce anything demanded in the subpoena. I’m not sure if the same requirement applies to criminal subpoenas.

Kevin R. Boyle

www.psblaw.com

> On Feb 12, 2020, at 8:55 AM, Robert Glassman <[REDACTED]> wrote:

>

> Thanks for letting us know. Can you send me a list of the schools you've subpoenaed and reached out to? Just want to make sure if she gets a call from someone, it is actually from someone who you've contacted and is legit. As you can imagine, there are lots of calls and emails to her and her manager saying all kinds of stuff.

>

> Robert Glassman, Esq.

> Panish Shea & Boyle LLP

> [REDACTED]

> Web: www.psblaw.com

>

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>

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

> From: [REDACTED] [mailto:[REDACTED]]

> Sent: Wednesday, February 12, 2020 8:51 AM

> To: Robert Glassman <[REDACTED]>

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

> [REDACTED]; Nathan Werksman <[REDACTED]>; Kevin Boyle

<[REDACTED]>

> Subject: RE: SDNY investigation

>

> Robert,

>

> Just as a brief heads up, we're in the process of requesting certain student records from schools [REDACTED] previously attended, to corroborate aspects of the relevant timeline, and some of those entities may take the position that they need to notify her of our requests. Rather than have her hear that in the first instance from them, we wanted to let you know. As you would expect, we have not referenced the Epstein investigation in our communications with any of those entities, or in the subpoenas, but again in an abundance of caution we wanted to reach out so you knew.

>

> thanks,

> [REDACTED]

>

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

> From: [REDACTED]

> Sent: Monday, February 10, 2020 17:09

> To: Robert Glassman <[REDACTED]>

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

Nathan Werksman <[REDACTED]>; Kevin Boyle <[REDACTED]>

> Subject: RE: SDNY investigation

>

> Confirmed, thanks -- see you at 11:00 on the 27th.

>

>

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

> From: Robert Glassman <[REDACTED]>

> Sent: Monday, February 10, 2020 17:08

> To: [REDACTED] <[REDACTED]>

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

Nathan Werksman <[REDACTED]>; Kevin Boyle <[REDACTED]>

> Subject: RE: SDNY investigation

>

> Yes. See you then.

>

> Robert Glassman, Esq.

> Panish Shea & Boyle LLP

> [REDACTED] Los Angeles, CA 90025

>

>

>

> Web: www.psblaw.com

>

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> Robert,

>

> We should be able to do any time Wednesday through Friday (26th-28th) of that week, with a preference for Thursday the 27th if that would be convenient for you and [REDACTED] What's good on your end?

>

> thanks,

> [REDACTED]

>

>

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

> From: [REDACTED]

> Sent: Friday, February 07, 2020 15:52

> To: Robert Glassman <[REDACTED]>

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

Nathan Werksman <[REDACTED]>; Kevin Boyle <[REDACTED]>

> Subject: RE: SDNY investigation

>

> Robert,

>

> Thanks very much for getting back to us -- I left a voicemail just a few minutes ago, hadn't yet seen your email, but we'll figure out the team's schedule and get back to you very shortly. That should work, but let us confirm.

>

> thanks,

> [REDACTED]

>

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

> From: Robert Glassman <[REDACTED]>

> Sent: Friday, February 07, 2020 15:43

> To: [REDACTED] <[REDACTED]>

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

Nathan Werksman <[REDACTED]>; Kevin Boyle <[REDACTED]>

> Subject: Re: SDNY investigation

>

> [REDACTED], how's the week of 2/24 instead? That's better for her.

>

>

> Robert S. Glassman

> Panish Shea & Boyle

> psblaw.com

>

>

>> On Feb 6, 2020, at 11:08 AM, [REDACTED] <[REDACTED]> wrote:

>>

>> Robert,

>>

>> We're still hoping to try to schedule an interview with [REDACTED] on February 19 (or the following couple days), per the below -- would that be a possibility? I'll give you a call tomorrow if we haven't connected by then but wanted to bump this from last week. Thank you!

>>

>> [REDACTED]

>>

>>

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

>> From: [REDACTED]
>> Sent: Friday, January 31, 2020 14:01
>> To: 'Robert Glassman' <[REDACTED]>
>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
>> <[REDACTED]>; 'Nathan Werksman' <[REDACTED]>; 'Kevin
>> [REDACTED]
>> Subject: RE: SDNY investigation

>> Robert,

>> Wanted to follow up on the below in case it was still useful to chat -- some combination of the team will be around next week if you want to have a call.

>> Separately, we're continuing to move forward with the investigation, including interviews with [REDACTED] family members, and we wanted to see if we might be able to put something on the calendar to come talk with [REDACTED] again once we've completed those steps. Would it work for you and her to meet anytime noon or later on February 19? Or if not the 19th, any availability on the 20th or 21st?

>> thanks very much,
>> [REDACTED]

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

>> From: [REDACTED]
>> Sent: Friday, January 24, 2020 03:45
>> To: Robert Glassman <[REDACTED]>
>> Cc: [REDACTED] <[REDACTED]>; [REDACTED]
>> <[REDACTED]>; Nathan Werksman <[REDACTED]>; Kevin
>> [REDACTED]
>> Subject: RE: SDNY investigation

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

>>>
>>> <https://www.nydailynews.com/new-york/ny-epstein-trump-victim-suit-20200118-m6sqsa2h7venpf5uewjrkvigo4-story.html>

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

>>> <https://nypost.com/2020/01/18/new-jeffrey-epstein-accuser-says-he-molest-ed-her-at-13-told-her-to-wear-childrens-underwear/>
>>> <https://www.the-sun.com/news/274369/jeffrey-epstein-first-victim-kids-underwear/>
>>> <https://www.dailymail.co.uk/news/article-7901651/Woman-claiming-Jeffrey-Epsteins-victim-says-introduced-Trump-age-14.html>

>>> thanks,

>>> [REDACTED]

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

>>> From: Robert Glassman <[REDACTED]>
>>> Sent: Friday, January 17, 2020 22:18
>>> To: [REDACTED] <[REDACTED]>
>>> Cc: [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

>>> Web: www.psblaw.com

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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]>; Nathan Werksman

>>> 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 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 Ms. [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,

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

>>>>> From: [REDACTED]
>>>>> Sent: Wednesday, December 11, 2019 13:15
>>>>> To: Robert Glassman <[REDACTED]>
>>>>> Cc: [REDACTED] <[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 Ms. [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,

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

>>>>> From: Robert Glassman <[REDACTED]>
>>>>> Sent: Wednesday, December 11, 2019 12:38
>>>>> To: [REDACTED] <[REDACTED]>
>>>>> Cc: [REDACTED] <[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
>>>> [REDACTED]
>>>> [REDACTED]
>>>> [REDACTED]
>>>> Web: www.psblaw.com

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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] <[REDACTED]>; Nathan Werksman

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

>>>> 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,

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

>>>>>> From: [REDACTED]
>>>>>> Sent: Monday, December 09, 2019 17:46
>>>>>> To: Robert Glassman <[REDACTED]>
>>>>>> Cc: [REDACTED] <[REDACTED]>; Nathan Werksman
>>>>>> <werksman@psblaw.com>; [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
>>>>>> <werksman@psblaw.com>; [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 13:31

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

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

>>>>>> <[REDACTED]>; [REDACTED]

>>>>>> <[REDACTED]>

>>>>>> Subject: Re: SDNY investigation

>>>>>>

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

>>>>>>

>>>>>>

>>>>>> Robert S. Glassman

>>>>>> Panish Shea & Boyle

>>>>>> psblaw.com

>>>>>>

>>>>>>

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

>>>>>>> <[REDACTED]> wrote:

>>>>>>>

>>>>>>>