

From: Robert Lewis <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: Epstein -- [REDACTED]
Date: Thu, 25 Jul 2019 18:11:08 +0000

Dear Alexander and Alison:

I represent [REDACTED], a potential witness in your Epstein case. As you will recall, we spoke about [REDACTED] back in March, when you reached out to see if [REDACTED] would speak to you and we agreed that you could. Although you have not contacted [REDACTED] I thought you should know about some recent developments.

For the last week or so the New York Times (Mike McIntire) has been aggressively reaching out to [REDACTED] Jesse Rose (his employment lawyer) and me (who represented him in the Maxwell case) by email and phone, as well coming to [REDACTED] home twice. He is seeking our comments and information concerning the Dubins and [REDACTED] testimony in the Maxwell case.

According to McIntire, the Times is planning to run story on the Dubins and their ties to Epstein. It also appears that the Times has a copy of all or a portion of the deposition [REDACTED] gave in the Maxwell case, which is troubling because it was subject to confidentiality in that case and, although the Second Circuit has ordered the unsealing of the summary judgment papers (which likely include references to [REDACTED] deposition testimony), no mandate has issued or documents been unsealed.

In addition, the Times tells us that a "representative" of the Dubins has told it that [REDACTED] "lied" in his deposition. If a representative did that, it is both defamatory and breaches a non-disparagement provision in the settlement agreement with [REDACTED]. The Times also informs that flight documents purportedly do not corroborate certain portions of [REDACTED] deposition. We do not have access to those flight documents, but we understand that Epstein's flight documentation is incomplete, if not materially inaccurate. Also pursuant to his settlement of his employment dispute with the Dubins [REDACTED] destroyed all of the documents he possessed pertaining to the Dubins, which might corroborate some of his testimony,

We have rebuffed the Times' entreaties because of confidentiality obligation [REDACTED] has pursuant to a settlement agreement in the employment case and the confidentiality order in the Maxwell case, as well as his desire to avoid doing anything that would undermine your criminal prosecution.

Should you need or want a copy of [REDACTED] deposition transcript in the Maxwell case, we would provide it to you pursuant to subpoena.

If you wish to discuss these matters, please do not hesitate to call.

Best regards,

Bob Lewis



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