

From: "[REDACTED]" <[REDACTED]>
To: Jeff Pagliuca <[REDACTED]>
Cc: Nicole Simmons <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: Maxwell
Date: Tue, 09 Jul 2019 23:38:05 +0000
Importance: Normal
Attachments: blank_proffer_agreement.pdf
Inline-Images: image001.jpg; image002.jpg

Jeff,

You're absolutely correct and I'm sorry for the delay. Attached please find the form proffer letter, as discussed. And it is on our calendar to have a call on this Thursday the 11th, 4 p.m. your time (and 6 p.m. our time). Please let us know if it would be useful to chat in the interim—we're happy to, if so—and we look forward to being in touch soon.

thank you,

From: Jeff Pagliuca [REDACTED]
Sent: Tuesday, July 09, 2019 18:56
To: [REDACTED] <[REDACTED]>
Cc: Nicole Simmons [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Maxwell

Hello,

I expect you all have been busy in the last few days. When we spoke yesterday I understood that you would be sending a form proffer letter for my review. I would like to discuss the document with my client as soon as possible to keep the process moving. When you get a chance please send the draft and I will hopefully be in a position to discuss a potential proffer meeting during our next call which I think is scheduled for 7-11 at 4pm my time.

Best Regards,

Jeff



Jeffrey S. Pagliuca
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203

www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you

From: [REDACTED] [mailto:[REDACTED]]
Sent: Sunday, July 7, 2019 1:46 PM
To: Jeff Pagliuca
Cc: Nicole Simmons; [REDACTED]; [REDACTED]
Subject: RE: Maxwell

Jeff,

Thanks for speaking with me this afternoon. I've copied my colleagues, [REDACTED] and [REDACTED], so that you have everyone's contact information.

In terms of scheduling a call tomorrow, we are going to be tied up in the morning, and the afternoon is a bit uncertain given that we are not sure yet of the timing of the presentment for Mr. Epstein. I think it would make sense to plan for a call at 4, and we can let you know if we need to reschedule, if that's alright with you.

Attached is the subpoena for Ms. Maxwell. The indictment is currently under seal, but we anticipate that it will be unsealed tomorrow morning and publicly available. Please let us know tomorrow if you have any difficulty and we can certainly send you a copy.

Thanks very much, and looking forward to discussing further tomorrow.

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

[REDACTED]
[REDACTED]

From: Jeff Pagliuca [REDACTED]
Sent: Sunday, July 7, 2019 3:09 PM
To: [REDACTED] <[REDACTED]>
Cc: Nicole Simmons [REDACTED]
Subject: Maxwell

Dear [REDACTED],

It was a pleasure talking to you today. As we discussed, I am authorized to accept service of the subpoena for testimony issued to Ms. Maxwell by the Grand Jury, SDNY. I expect that we will need to coordinate a mutually convenient time to either appear or proffer, either in advance or in lieu of any testimony.

I will be in court tomorrow morning and afternoon, so I have a small window to discuss the matter- probably between 11am and noon and then again at around 4pm my time which is 2 hrs. earlier than the East Coast. My staff will attempt to

obtain a copy of the Epstein indictment as soon as it is publicly available. In my experience this can sometimes be difficult so If it is not an inconvenience perhaps you could email the indictment along with the subpoena and waiver.

Best Regards,

Jeff



Jeffrey S. Pagliuca
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, Colorado 80203

www.hmflaw.com

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain information that is confidential or legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that you must not read this transmission and that any disclosure, copying, printing, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. If you have received this transmission in error, please notify the sender by telephone or return e-mail and delete the original transmission and its attachments without reading or saving it in any manner. Thank you