

From: "[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Maxwell/Epstein

Date: Tue, 19 May 2020 19:56:10 +0000

[REDACTED] – as an FYI, we expect to have the Maxwell memo to you by the end of the week. Because the team was able to get in the Farmer interview last week, they incorporated that rather than address the issues seriatim. They're in the process of turning our edits to the combined memo. So it will probably make sense to set a time to talk through the issues next week.

Also, we wanted to update you that the team was contacted by trustees' counsel recently, who conveyed that the estate is beginning to take steps to sell illiquid assets, including NY and other properties, in order to meet its July 15 tax deadline. The estate apparently tried to get the IRS to hold off on the tax enforcement until it settles a number of contingent liabilities, but the IRS will not agree. The attorneys said they would be willing to discuss some way to maintain our forfeiture interest in a relevant amount. Consistent with prior directions, the team did not respond / engage on the issue, but we wanted to update you on this. We can add it to the list of items to discuss next week.