

From:
To:
Cc:

[REDACTED]

Subject: Re: [REDACTED] Motion

Date: Fri, 03 Apr 2020 18:40:13 +0000

Many thanks, [REDACTED] Yes, it will be entirely under seal.

I'm waiting to hear back from [REDACTED] to see what her position will be on it and as soon as I know that, I will file. Hopefully soon. [REDACTED]

Please stay safe and thanks very much for getting back to me so quickly.

Sarah

Sarah Coyne
Partner

Weil, Gotshal & Manges LLP

[REDACTED]
[New York, NY 10153](#)
[REDACTED]

On Apr 3, 2020, at 2:38 PM, [REDACTED] wrote:

Hi Sarah,

Thank you, we hope you are safe and well too. We will review this. For planning purposes, when do you intend to file this, and would it (or at least this portion) be under seal? Thanks.

From: Coyne, Sarah [REDACTED]
Sent: Friday, April 3, 2020 12:16 PM
To: [REDACTED]
Subject: [REDACTED] Motion

Hi [REDACTED]

I hope this email finds you and your families safe and healthy.

[REDACTED]

As you also know, [REDACTED] has attempted to cooperate on a number of matters at the SDNY, including with the investigation into the events surrounding Jeffrey Epstein's death.

In light of all these circumstances, I am going to be filing a motion to have [REDACTED] sentence reduced. I have discussed this with EDNY AUSA [REDACTED] and provided her with a draft of the motion. It is my great hope that she will join in it.

I am attaching here the portion of the motion that discusses her assistance to your investigation for two reasons. First, I don't want to misrepresent/misstate any aspect of her assistance or characterize your position on it in any way that you disagree with. Second, while I understand you might not feel a Rule 35 motion is merited, I am hoping you will agree to advise the Court (or allow me to) that she did try to assist you.

Please let me know your thoughts. I am happy to discuss by phone, as well.

I should note that the motion will be filed under seal.

Stay safe,
Sarah

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