

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED] ([REDACTED])" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: RE: Epstein SW returns

Date: Mon, 12 Oct 2020 17:27:41 +0000

Embedded: RE: _Epstein_search_materials_for_upload_and_privilege_review.msg

A couple quick clarifications on this – regarding privilege terms, it wasn't the estate lawyers who communicated those, because at the time there was no estate (Epstein was still alive). [REDACTED], I believe that you received a list or document relating to privilege terms directly from Marty Weinberg, Reid Weingarten, and/or Michael Miller. That likely would have been in July 2019. I assume it's the list of terms you sent in the attached email from February, but I could be wrong – the case team was not included on any communications you had directly with Epstein's attorneys at the time.

With respect to the estate, investigators, and Roy Black, unless Epstein *also* had a private investigator named Roy Black, is it possible that the emails relate to his attorney Roy Black? He was represented by Roy Black of Black Srebnick Kornspan & Stumpf, and it looks like there are two terms relating to Roy Black in the list you sent to [REDACTED] in the attached.

To the extent that doesn't resolve the question, though, the emails for the attorneys for the estate, Andrew and Marc, are:

[REDACTED]
[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 12, 2020 13:15
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein SW returns

I've never dealt with them. Have you or [REDACTED] been dealing with Marc or Andrew?

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 12, 2020 1:06 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Epstein SW returns

Marc Weinstein and Andrew Tomback represent the co-executors of the estate (Darren Indyke and [REDACTED]).

Sent from my iPhone

On Oct 12, 2020, at 12:55 PM, [REDACTED] <[REDACTED]> wrote:

Who represents the estate?

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 12, 2020 12:52 PM

To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Epstein SW returns

Hi [REDACTED],

Thanks— from what I remember, the estate communicated with you directly about this, so I don't remember getting a list.

Sent from my iPhone

On Oct 12, 2020, at 12:38 PM, [REDACTED] <[REDACTED]> wrote:

Hi [REDACTED],

Hope you're well too. Did Epstein's lawyers also give you the list of attorneys? And can you remind me who they are?

Thanks, [REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 12, 2020 11:50 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]> <[REDACTED]>
Subject: Re: Epstein SW returns

Hi [REDACTED],

Hope you're doing well, and thanks very much for your help with privilege issues for this review. In our review of this database, we have come across some communications (emails and reports) from private investigators— among others, an investigator named Roy Black. We are generally aware that Epstein hired private investigators in connection with a criminal investigation and related civil litigation in Florida.

We don't know whether these materials are privileged. Could you possibly confer with the estate attorneys to determine whether they are asserting a privilege over communications by private investigators? In the meantime, we will stop reviewing the database unless we hear from you otherwise.

Thanks very much,

[REDACTED]

Sent from my iPhone

On Oct 12, 2020, at 10:53 AM, [REDACTED] <[REDACTED]> wrote:

Thanks very much, [REDACTED].

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 12, 2020 10:51 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]> <[REDACTED]>
Subject: RE: Epstein SW returns

The Goldberger hits have been moved out.

Thanks, [REDACTED]

From: [REDACTED]
Sent: Sunday, October 11, 2020 5:14 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein SW returns

That is Jack Goldberger's email address. I'll ask to have the Goldberger hits pulled now and will let you know when they are moved out.

From: [REDACTED] <[REDACTED]>
Sent: Sunday, October 11, 2020 12:52 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] ([REDACTED]) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Epstein SW returns

Hi [REDACTED],

For the Epstein search warrant database, I saw an email from the following email address that I wanted to flag for further privilege review, because it may belong to Jack Goldberger, who represented Epstein:

[REDACTED]

Thanks,

[REDACTED]

[REDACTED]