

From: "[REDACTED]" <[REDACTED]>
To: Andrew Patel <[REDACTED]>
Cc: Jill Shellow <[REDACTED]>, Don Yannella <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: [REDACTED]/Epstein
Date: Fri, 20 Dec 2019 23:36:40 +0000

Andy,

We cannot agree to these redactions, and think it would be appropriate for you to file a motion before Judge Torres, under seal and copying the Government (but ex parte as to the defense). Could you please send us a copy of the letter before you file it, so that we can ensure that our position is accurately represented? Thanks very much.

-----Original Message-----

From: Andrew Patel <[REDACTED]>
Sent: Friday, December 20, 2019 5:14 PM
To: [REDACTED] <[REDACTED]>
Cc: Jill Shellow <[REDACTED]>; Don Yannella <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; Andrew Patel <[REDACTED]>
Subject: RE: [REDACTED]/Epstein

[REDACTED],

We have attached a proposed disclosure cover letter that is modeled on a letter sent by the Government in *United States v. Madonna*, 17 Cr. 89 (CS). We have also attached proposed redacted disclosures. As you and I discussed, we offer this as a means to ensure our client's safety while permitting the Government to comply with what you believe are your disclosure obligations.

As an alternative, we are willing to apply under seal to Judge Torres for a Protective Order to preclude the disclosure. Our client is not a witness, and so this is not 3500 material, nor is it Rule 16 material. We do not believe that this is in fact Brady material, but rather is an error made by our client that we understand is contradicted by the surveillance video evidence. While we applaud your efforts, we have an obligation to make sure that our client is not harmed by the possible release of the fact that he met with your Office.

We understand that you have time constraints. Please let us know how you want to proceed so that we can file a motion before Judge Torres promptly if that is necessary.

Andy

Andrew G. Patel
Attorney at Law

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

CONFIDENTIALITY NOTICE: This e-mail message is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510-2521. It is legally privileged. The information it contains is confidential information and is

intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of the communication is strictly prohibited. If you have received this e-mail in error, please notify me immediately by telephone at (212) 349-0230 and by return e-mail, and delete all copies of the message from your computer. Thank you.

-----Original Message-----

From: [REDACTED] [mailto:[REDACTED]]
Sent: Friday, December 20, 2019 10:01 AM
To: Andrew Patel
Cc: Jill Shellow; Don Yannella; [REDACTED]; [REDACTED]
Subject: RE: [REDACTED]/Epstein

Andy,

Attached are unredacted and redacted copies of the notes. As discussed, we intend to produce redacted copies of the notes pursuant to the protective order, and produce Mr. [REDACTED] name and your contact information to defense counsel on an AEO basis. The file name will be changed to the bates number so it will not include his name.

I'm also copying my co-counsel [REDACTED] and [REDACTED] please include them on emails going forward. Finally, [REDACTED] is aware that we are providing these notes to you.

Thanks, and please feel free to give us a call to discuss.

-----Original Message-----

From: Andrew Patel <[REDACTED]>
Sent: Friday, December 20, 2019 8:15 AM
To: [REDACTED] <[REDACTED]>
Cc: Andrew Patel <[REDACTED]>; Jill Shellow <[REDACTED]>; Don Yannella <[REDACTED]>
Subject: [REDACTED]/Epstein

[REDACTED],
Please send us a copy of the disclosure that you are considering as to Mr. [REDACTED]. Seeing the planned disclosure about our client will help us fashion a means of addressing the concerns we discussed last night.
Many thanks,
Andy

Andrew G. Patel
Attorney at Law

[REDACTED]
[REDACTED]
[REDACTED]

Sent from my phone