

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

Subject: RE: Briefing in Florida regarding whether the Florida NPA extends to New York - concession by Epstein's attorney that NPA only applies in Florida

Date: Wed, 07 Aug 2019 19:07:23 +0000

Attachments: Exh_067_EPSTEIN_PLEA_CONFERENCE_CRIMINAL_06-30-08.pdf

Hi [REDACTED],

You and the team there may have already seen this, but in view of the importance of the issue, I wanted to pass it along.

Attached is the transcript of the hearing from Florida state court in 2008, in which Epstein pled guilty to Florida state charges. During the course of questioning by the judge, Epstein's Florida attorney (Jack Goldberger) stated (on Epstein's behalf) that the NPA contained an obligation by the U.S. Attorney's Office for the Southern District of Florida "not [to] prosecute Mr. Epstein in the Southern District of Florida" See page 38 (emphasis added). I wanted you to be sure to have this information, as the subject is likely to be important.

[REDACTED] for Jane Doe 1

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (phone) [REDACTED] (fax)
[REDACTED]

You can access my publications on [REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 25, 2019 8:25 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Briefing in Florida regarding whether the Florida NPA extends to New York

Will do.

From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 25, 2019 22:24
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Re: Briefing in Florida regarding whether the Florida NPA extends to New York

Perfect - call my cell - [REDACTED]

[REDACTED] - sent from my iPhone - please excuse brevity and errors.

On Jul 25, 2019, at 8:21 PM, [REDACTED] <[REDACTED]> wrote:

Thanks very much. Would 10:00 a.m. tomorrow your time (noon our time) work? If so, we can call you then at [REDACTED], or if not, we could also do 2:00 p.m. your time.

thanks,

From: [REDACTED] <[REDACTED]>

Sent: Thursday, July 25, 2019 22:13

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: Re: Briefing in Florida regarding whether the Florida NPA extends to New York

Happy to chat tomorrow. Name your time that's convenient for you.

[REDACTED] - sent from my iPhone - please excuse brevity and errors.

On Jul 25, 2019, at 8:07 PM, [REDACTED] <[REDACTED]> wrote:

[REDACTED]

Thank you for sending us these materials, we appreciate being able to stay up to date, and we'll continue to keep an eye on the docket for submissions that may be relevant for our investigation.

Separately, might you be available for a quick call sometime tomorrow (Friday) or next week? No rush or emergency, but we wanted to talk with you about a question in connection with your expertise on the CVRA generally. At your convenience.

thanks,

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: Thursday, July 25, 2019 13:01

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

Subject: RE: Briefing in Florida regarding whether the Florida NPA extends to New York

Hi [REDACTED],

I wanted to make you aware of a recent filing (on Tuesday) by Jane Doe 1 and 2 in the Florida CVRA case. See attached. You may find interesting our argument at pp. 3-6, in which we explain why Judge Marra must craft remedies in the case that relate solely to Florida crimes and Florida victims ... because the NPA only covers Florida.

We filed our reply brief on remedies on Tuesday – and that should have brought all briefing on remedies for the CVRA violation to a close. But yesterday Epstein's lawyer (Marty Weinberg) filed a motion for a sur-reply. See attached. In point (a) on page 2, he argues that he should have an opportunity to file a sur-reply discussing, among other things, the scope of the NPA. On Monday, we will be filing an opposition to Weinberg extending the briefing further. It appears that Judge Marra is poised to rule rapidly on the motion for a sur-reply, as he asked for us to respond quickly.

I wanted to make you aware of these developments. My clients were told back in 2013 that the NPA did not extend to New York or other jurisdictions – and that is the point we are making to Judge Marra.

