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**Cc:** "Tomback, Andrew" <[REDACTED]>

**Subject:** Grand Jury subpoena response  
**Date:** Fri, 01 Nov 2019 21:15:23 +0000

**Attachments:** 1953\_Trust\_executed.pdf; 2019-2\_Amended\_and\_Restated\_Jeffrey\_E.\_Epstein\_2019\_Trust.pdf; 2019-1\_Jeffrey\_E.\_Epstein\_2019\_Trust\_.pdf

[REDACTED]:

This responds to the October 18, 2019 grand jury subpoenas to the executors of the estate of Jeffrey Epstein. Each subpoena requests the following:

1. The 1953 Trust agreement and any trust documents referenced or referred to within The 1953 Trust (the "Trust Documents");
2. Any drafts or notes of the Trust Documents; and
3. Any communications relating to the Trust Documents.

Attached in response to request 1 are "The 1953 Trust" (dated August 8, 2019), the "Amended and Restated Jeffrey E. Epstein 2019 Trust" (dated February 4, 2019) and the "Jeffrey E. Epstein 2019 Trust" (dated January 18, 2019) (the latter two of which are referenced in the 1953 Trust), bearing bates numbers GJ\_00001 through GJ\_00102.

As discussed on our call, with respect to requests 2 and 3, we believe that most, if not all, of the communications relating to the formation of the Trust Documents are privileged. In addition, the scope of requests 2 and 3 is quite broad, and the government, rather than the Executors, is in possession and control of some of the potential sources of such information (i.e., Mr. Epstein's computers). We therefore agreed to defer production of any non-privileged documents responsive to those requests and further agreed to revisit what (if anything) the government further sought with respect to requests 2 and 3 until after the government has reviewed the Trust Documents.

Regards,  
Marc

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