

From: Sigrid McCawley <[REDACTED]>
Subject: RE: Depo
Date: 20 November 2018 at 08:46:13 GMT
To: [REDACTED] <[REDACTED]>
Cc: Stan Pottinger <[REDACTED]>, "[REDACTED]", "Paul Cassell ([REDACTED])" <[REDACTED]>, Meredith Schultz <[REDACTED]>, "Brittany Henderson ([REDACTED])" <[REDACTED]>

Hello [REDACTED] -could you ask your [REDACTED] that the issues with [REDACTED] and make tasks requiring concentration, like a deposition, very difficult and they should be avoided until you have been [REDACTED] which will likely be in mid January

Thank you.

Sent by Boxer

On November 19, 2018 at 4:57:11 PM EST, Sigrid McCawley <[REDACTED]> wrote:

Thanks for the update [REDACTED] and I am so sorry to hear about [REDACTED]. In addition to the travel could you see if the [REDACTED] that the [REDACTED] and you will not be in a position to do anything that involves work, including sitting through a deposition? (Or maybe someone else on the team has better language to propose). It is fine if it is in [REDACTED] - we can [REDACTED]

Thank you, Sigrid

Sigrid McCawley Partner

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From: [REDACTED] [mailto:[REDACTED]] **Sent:** Monday, November 19, 2018 4:46 PM
To: Sigrid McCawley
Cc: Stan Pottinger; [REDACTED]; Paul Cassell ([REDACTED]); Meredith Schultz; Brittany Henderson ([REDACTED])
Subject: Re: Depo

Hi Sigrid,

I was at the [REDACTED]
[REDACTED] All good now and whilst I was there asked them about the [REDACTED] I have an appointment at 12pm tomorrow with the [REDACTED] and travel dates. Unfortunately it will be in [REDACTED] but you'll have that by tomorrow. You also have the [REDACTED] records which shows my [REDACTED]

My personal preference is to do the deposition early-mid January as I am still [REDACTED] never mind doing a deposition on top of that. The [REDACTED]

I also also starting to move house in the next week, which I have no idea how I will manage but at this moment in time I don't think I will be able to handle doing the deposition before Christmas. There is time in January?

Please please can you do your best to delay my deposition until I am well and able.

Kind Regards

[REDACTED]

On 19 Nov 2018, at 21:02, Sigrid McCawley <[REDACTED]> wrote:

Hello [REDACTED] – We informed Epstein/[REDACTED] counsel that you are not able to travel next week to [REDACTED] As expected, they are requesting a [REDACTED] Are you able to get a [REDACTED] and are not able to travel until Mid January? Please don't have them put a lot of detail in it – just a [REDACTED]

As you cannot travel, we offered that they could take the deposition in [REDACTED] as an alternative. We are waiting to hear back from them on those possible

arrangements.

Thank you and hope you are doing great, Sigrid

Sigrid McCawley Partner

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)

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