

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Friday, August 15, 2008 12:21 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** RE: Draft Protective Order - slight tweak

Hello [REDACTED] and [REDACTED],

First, I don't know if we've been formally introduced. Nice to meet you ... electronically at least.

Second, on the language -- As [REDACTED] mentioned, we need to see this document quite quickly in view of the Government's representations yesterday that Epstein is trying to ignore the agreement. As a result - and in view of the difficulty of making immediate contact with our clients -- I propose one change. Instead of this:

Prior to producing the documents to Petitioners' counsel, a copy of this Order must be provided to counsel and their clients, who must review and acknowledge their receipt of and agreement to abide by the terms of this Order, and who must provide a copy of that acknowledgment to the USAO.

How about this:

Before counsel for Petitioner's show the agreement to their clients or discuss the specific terms with them, they must provide a copy of this Order to Petitioners, who must review and acknowledge their receipt of and agreement to abide by the terms of this Order. Counsel for Petitioner's must promptly provide a copy of that acknowledgment to the USAO.

I assume that the USAO is not concerned about us as attorneys somehow ignoring the Court's protective order, so this change would focus in on the non-law trained clients.

[REDACTED]  
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