

From:
To:
Cc:



Subject: Re: Jane Does [REDACTED] U.S. (re Jeffrey Epstein) - Litigation Hold - Additional

Date: Thu, 04 Nov 2010 14:19:29 +0000

Importance: Normal

P.s. I think you have to take your start date back much further -- 2005 or 2006.

From:



Sent: Tuesday, November 02, 2010 06:01 PM

To:



Cc:

Subject: RE: Jane Does [REDACTED] U.S. (re Jeffrey Epstein) - Litigation Hold - Additional

Good Afternoon:

In furtherance of the Lit Hold materials I sent to you, please know that I have to inform the National Preservation Officer at EOUSA in Washington as well as [REDACTED] (here in the S.D. Fla) of the Lit Hold and inform them of key names.

To that end, I gathered from the unsealed Court filings the names set forth below. Please let me know if there are any other names that should be identified. Please let me know [REDACTED] first name.

I will also need the names of the victims that would be Jane Doe # 1 and Jane Doe #2 for preservation purposes. This information will be kept confidential. If the USAO-SDFLA Lit Hold efforts are ever the subject of discovery, we can redact the victim names...as was done in the letters filed with AUSA Villafaña's first declaration.

Also, I will need your assistance in preparing letters to the FBI and Palm Beach P.D. to urge them to place a Hold on any documents that they may have....unless you advise that a hold is already in place.

Finally, please let me know if the Lit Hold Time Frame I suggested is correct, or if it should commence with an earlier date.

- [REDACTED] (Jane Doe Petitioner in Civil action ???)
- [REDACTED] (Jane Doe Petitioner in Civil action ???)
- [REDACTED] (Jane Doe Petitioner in Civil action ???)
- Bradley J. Edwards, Esq, Counsel for [REDACTED]
- Paul G. Cassell, Counsel [REDACTED]
- Jay C. Howell, Counsel for [REDACTED] ??

- James Eisenberg, Esq., Original counsel for [REDACTED] ???????
- Jeffrey Epstein, Defendant in state criminal action and party to USAO-SDFLA Non-Prosecution Agreement
- Lilly Ann Sanchez, Counsel For Epstein
- Jack Goldberger, Counsel for Epstein
- [REDACTED] Assistant United States Attorney
- [REDACTED] Special Agent, F.B.I.
- Special Agent [REDACTED], F.B.I.
- [REDACTED], Assistant United States Attorney
- Federal Bureau of Investigation ("FBI")
- [REDACTED], FBI Victim Specialist
- Palm Beach Florida Police Department

From: [REDACTED]
Sent: Tuesday, November 02, 2010 5:48 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Jane Does [REDACTED] U.S. (re Jeffrey Epstein) - Litigation Hold
Importance: High

<< File: Re.Jeffrey Epstein.Jane Does [REDACTED] U.S. - 11.2.2010 JAW Lit Hold Ltr to Individual in USAO.SD.Fla.pdf >> << File: Re.Jeffrey Epstein.Jane Does [REDACTED] U.S. - Typable 3-13.300.003 Attachment.1.pdf >>

As a follow-up to your recent meeting concerning the above-referenced case, I write this letter in my capacity as the Electronic Discovery Coordinator within the Civil Division of the United States Attorney's Office for the Southern District of Florida (USAO-SDFLA) to advise you of the USAO-SDFLA's legal obligation to preserve documents and data relevant to the lawsuit and to enlist your assistance in this regard.

I request that you please read and acknowledge your receipt and agreement to the terms of this letter. I also ask that you please complete and sign the form accompanying this letter. Please return the originals of both documents to me by November 9, 2010.

Should you have any questions, please let me know.

[REDACTED]
 Assistant United States Attorney

Office of the United States Attorney

Southern District of Florida

