

From: "Robert D. Critton Jr." <[REDACTED]>

To: [REDACTED]

Subject: RE: E-mail to [REDACTED]

Date: Wed, 30 Jun 2010 20:05:22 +0000

Importance: Normal

Priority: normal

Inline-Images: image001.gif; image002.jpg; bclc.gif; bestlawyers.jpg

[REDACTED] - Having the docs being scanned, are you ok w/ pdf or hard copies delivered before 5? bob



Robert D. Critton Jr. - Attorney at Law



This e-mail contains legally privileged and confidential information intended only for the individual or entity named within the message. Should the intended recipient forward this message to another person or party, that action could constitute a waiver of the attorney/client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited. If this communications was received in error, please notify us by reply e-mail and delete the original message.

Disclaimer added by **CodeTwo Exchange Rules**
www.codetwo.com

From: [REDACTED]
Sent: Wednesday, June 30, 2010 11:51 AM
To: Robert D. Critton Jr.
Subject: RE: E-mail to Marie

Hi Bob – Just got back from court. I was able to open what you sent yesterday. If you could have your courier deliver the items, I would appreciate it. Also, can you tell me your plan for production (i.e., is it going out by FedEx tonight)? So that I can figure out my timetable if I have to file an emergency motion.

Thank you.

[REDACTED]

EFTA00207660

Assistant U.S. Attorney

[REDACTED]

From: Robert D. Critton Jr. [mailto:rcrit@bclclaw.com]
Sent: Wednesday, June 30, 2010 9:29 AM
To: [REDACTED]
Cc: Michael J. Pike
Subject: RE: E-mail to Marie

Were you able to open the information that I sent yesterday? The rest should be here this morning and hope to have it copied and to you by noonish—where will you be? You can come by here or I can have it delivered. Assembling is taking longer than expected, sorry,— mike who works w me is pulling it together, bob



Robert D. Critton Jr. - Attorney at Law

[REDACTED]



This e-mail contains legally privileged and confidential information intended only for the individual or entity named within the message. Should the intended recipient forward this message to another person or party, that action could constitute a waiver of the attorney/client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited. If this communications was received in error, please notify us by reply e-mail and delete the original message.

Disclaimer added by [CodeTwo Exchange Rules](http://www.codetwo.com)
www.codetwo.com

From: [REDACTED]
Sent: Wednesday, June 30, 2010 9:12 AM
To: Robert D. Critton Jr.
Subject: RE: E-mail to Marie

Hi Bob – Nothing has arrived yet. I am running off to court now. Can I pick the items up from you or will they be delivered this morning?

[REDACTED]

Assistant U.S. Attorney

EFTA00207661



From: Robert D. Critton Jr. [REDACTED]
Sent: Tuesday, June 29, 2010 [REDACTED]
To: [REDACTED]
Subject: RE: E-mail to Marie

Sure, is it in the flagler tower bldg on the intrcoastal where jones and foster's office is?



Robert D. Critton Jr. - Attorney at Law



This e-mail contains legally privileged and confidential information intended only for the individual or entity named within the message. Should the intended recipient forward this message to another person or party, that action could constitute a waiver of the attorney/client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited. If this communications was received in error, please notify us by reply e-mail and delete the original message.

Disclaimer added by [CodeTwo Exchange Rules](http://www.codetwo.com)
www.codetwo.com

From: [REDACTED]
Sent: Tuesday, June 29, 2010 1:55 PM
To: Robert D. Critton Jr.
Subject: Re: E-mail to Marie

Can you deliver to our wpb office?

From: Robert D. Critton Jr. <[REDACTED]>
To: [REDACTED]
Sent: Tue Jun 29 13:25:56 2010
Subject: FW: E-mail to Marie

[REDACTED] --See below, my typing skills are limited as I am sure you noted, bob



This e-mail contains legally privileged and confidential information intended only for the individual or entity named within the message. Should the intended recipient forward this message to another person or party, that action could constitute a waiver of the attorney/client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited. If this communications was received in error, please notify us by reply e-mail and delete the original message.

Disclaimer added by **CodeTwo Exchange Rules**
www.codetwo.com

From: Connie Zaguirre, CP, FRP
Sent: Tuesday, June 29, 2010 1:23 PM
To: Robert D. Critton Jr.
Subject: E-mail to Marie

[REDACTED]

We are in the process of compiling the letters sent to counsel by representatives of the USAO to comply with the court order to produce by end of business Wednesday. The process is ongoing since they are in the possession of so many different attorneys. Attached is a small sample (19 pages). We have objected to the production on Mr. Epstein's behalf believing they are irrelevant to the civil litigation, certainly inadmissible, and that their production chills the candor of plea negotiations in future cases thus the order violates the spirit of FRE 410 and 408. We have exhausted our objections on Mr. Epstein's behalf, see DE 172 (in 08-80893) regarding an order on our motion for protective order and believe that the USAO should consider intervening to protect its principled interest in the confidentiality of the correspondence. A binder of the compiled letters is being copied for your review if requested and will be supplemented when additional letters are located for production. Please advise where we should deliver them.

Bob



Connie Zaguirre, CP, FRP - Assistant for Robert D. Critton, Jr.

303 P... P... 1187... 1001W... P... P... 1187... 1187... 1187...



This e-mail contains legally privileged and confidential information intended only for the individual or entity named within the message. Should the intended recipient forward this message to another person or party, that action could constitute a waiver of the attorney/client privilege. If the reader of this message is not the intended recipient, or the agent responsible to deliver it to the intended recipient, you are hereby notified that any review, dissemination, distribution or copying of this communication is prohibited. If this communications was received in error, please notify us by reply e-mail and delete the original message.

Disclaimer added by **CodeTwo Exchange Rules**
www.codetwo.com