

From: "KATHERINE W. EZELL" <KEZELL@PODHURST.com>

To: "[REDACTED]" <[REDACTED]>

Cc: "ROBERT C. JOSEFSBERG" <RJOSEFSBERG@PODHURST.com>

Subject: FW: Jane Doe Litigation

Date: Mon, 15 Jul 2013 23:54:18 +0000

Importance: Normal

Dear [REDACTED], When I saw this and called [REDACTED] to line him up for a conference call, he said that he had spoken to you and that you will be sending us pertinent materials. We received those. Thank you. We surely want to be supportive of you while preferring not exposing our clients to any more trauma. All of them were given the choice of whether to sue or have us simply try to represent them in working out individual settlements, all the while maintaining their anonymity. None of them wanted to go to trial or ever have to face Epstein or their community again regarding the facts of their particular cases. As you know we have confidentiality agreements with Epstein, which obviously could be overcome by court order. Of course it is most likely that any recoveries they received are long gone. Also, we do not know how to reach most of them currently. As soon as they got their money, they wanted no more to do with us or Epstein, preferring to put the troubling memories, fears and concerns all behind them. In one or two cases where their parents did not know about their lawsuits, our trying to locate them now through parents would be destructive in itself.

I realize that all of this is meaningless at this point, knowing as little as I do. I am concerned, however, that should you be compelled to release investigative materials while being allowed to merely delete names, SS#, birthdates, addresses, etc., depending what information is included, such deletions might not be enough to protect the identities of some of these girls.

Anyway, we want to help you anyway we can and protect our clients. Keep us posted and let me know when you need us to do anything. My best, Kathy

Katherine W. Ezell

Partner

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From: Villafana, Ann [REDACTED] C. (USAFLS) [mailto:[REDACTED]]

Sent: Monday, July 15, 2013 11:55 AM

To: ROBERT C. JOSEFSBERG; KATHERINE W. EZELL

Subject: Jane Doe Litigation

Dear Bob and Kathy:

Are you available any time today to talk about the Jane Doe litigation? Judge Marra recently issued some rulings that may impact your clients.

Thank you so much.

[REDACTED]
Assistant U.S. Attorney

Southern District of Florida

[REDACTED]
[REDACTED]
[REDACTED]

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