

[REDACTED]

Subject: RE: Discovery and VR materials

Date: Wed, 02 Jul 2014 22:42:55 +0000

Importance: Normal

Inline-Images: image001.png; image002.png; image003.jpg; image004.png

[REDACTED]

I have been in touch with the Deputy Attorney General's Office, and they tell me they will have the responsive materials in two to three weeks. I know that you and [REDACTED] were particularly interested in the production from the DAG's Office. I am continuing to review e-mails to determine if there are any more that are responsive. I am checking with [REDACTED] to see if she is still reviewing information. Thank you.

[REDACTED]

Sent: Tuesday, July 01, 2014 3:01 PM

[REDACTED]

Subject: RE: Discovery and VR materials

[REDACTED]

I imagine that you are swamped over there, and as we have said before we understand and appreciate that fact. However, we are in the process of deciding how best to proceed with this case and cannot make that decision until we receive all of the correspondence that we are owed, or at least know definitively that production is complete and we therefore have everything.

I believe, especially in light of our previous communications, that you intend to produce a volume of additional information, but I could be wrong. Can you please (1) tell us there is no more to be produced; or (2) produce whatever remains to be produced; or at the least (3) give us a date when we should expect to receive everything not already produced?

To the extent that we need to file any motions to obtain the discovery, we will wait until after July 8, 2014. We are hoping that gives you enough time to check into things for us. Thanks again.

Sincerely,



**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.**

[REDACTED]

Board Certified Trial Attorney

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

[REDACTED]

EFTA00209281



[REDACTED]

Subject: RE: Discovery and VR materials

[REDACTED]

Thanks very much for sending these materials. We appreciate what you sent and your time in tracking them down.

It is quite obvious that there is still much left to be produced. Please give us an estimate as to when those items will be produced, particular materials from the Department of Justice in Washington (i.e., the Deputy Attorney General's Office). As you know, we have been patient, and continue to be patient, but we need to know a true date for when the production will be complete. We think that we can all agree that now that the mandate has issued the production should be finalized immediately.

Thanks again for working on this. [REDACTED]

[REDACTED]

You can access my publications on <http://ssrn.com/author=30160>

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[REDACTED]

Sent: Wednesday, June 25, 2014 4:37 PM

[REDACTED]

Subject: RE: Discovery and VR materials

[REDACTED]

After our conference call, I went back through the e-mails and attempted to match up the production you received from Epstein. I have attached what I have located so far. On some of the e-mails, I have redacted the header and message, which is a forwarding of an e-mail from Epstein's attorney from one DOJ attorney to another. I did this because we are not waiving the attorney-client or attorney work product privileges in producing these e-mails. Deleting the header was quicker than trying to find the original message from Mr. Lefkowitz.

[REDACTED]

Subject: RE: Discovery and VR materials

[REDACTED]

It's been a while now, and E [REDACTED] and I were wondering when the Government's production of the court-ordered materials will be finalized. Brad and I would like to begin discussing a possible stipulation of facts. But of course we can't really begin that process until we know that the Government has delivered to us everything that it has been required to produce.

So – (1) When can we expect to have all the discovery materials to us? We hope it is soon.
(2) Have you been able to locate the 302's for [REDACTED]

Thanks for your help on these things. [REDACTED] for Jane Doe #1, Jane Doe #2, and VR

[REDACTED]

You can access my publications on <http://ssrn.com/author=30160>

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Sent: Tuesday, May 20, 2014 10:14 PM

[REDACTED]

Subject: Re: VR materials

I'm free as well. Cell is [REDACTED]

[REDACTED] sent from my iPhone - please excuse brevity and errors.

On May 20, 2014, at 7:59 PM, [REDACTED] wrote:

Thanks. Please excuse my typographical error. Tomorrow is May 21.

[REDACTED]

Subject: Re: VR materials

After 4:00 I can be reached on my cell. [REDACTED]

Sent from my iPhone

On May 20, 2014, at 9:44 PM, [REDACTED]

[REDACTED]
Are you available for a conference call tomorrow, May 22, after 3:00 pm, Eastern time? Thanks.
[REDACTED]

Subject: RE: VR materials

[REDACTED]
I am writing to follow up and see if you were able to locate any materials about FBI interviews with [REDACTED]. We're not trying to create a lot of work here - just the FBI 302's (or comparable documents) for interviews with her. You indicated (below) you were going to check on that. Your help on this point would be greatly appreciated. Thanks!

[REDACTED]

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[REDACTED]
Subject: RE: (1) any more production; (2) VR materials

[REDACTED]
The government has not produced all the correspondence requested. I am working on correspondence between Epstein's attorneys and the Child Exploitation and Obscenity Unit, which I should be able to e-mail tomorrow. [REDACTED] also working on additional material to be produced. Finally, there may be responsive materials from the DAG's office, which is different from what we produced to you on May 2, 2014.

I will check to see if we have any documents regarding [REDACTED]
[REDACTED]

[REDACTED]
Subject: RE: (1) any more production; (2) VR materials

EFTA00209284

[REDACTED]

We are writing for two reasons. First, we would like to confirm that you have produced all the correspondence that we have requested - that you're not contemplating any more production.

Second, we now represent [REDACTED] in her capacity as a crime victim. As such, we are requesting her 302's and all other information you have gathered with respect to her.

Thanks for your help on this.

[REDACTED]

[REDACTED]

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[REDACTED]

Subject: RE: Jane Does No. 1 and 2 [REDACTED] United States - Production of Documents - is one missing?

Hi Dexter,

[REDACTED] and I wanted to thank you for producing the correspondence last Friday. We're sure that was a lot of work, and we appreciate you getting that to us in a timely fashion.

[REDACTED] and I wanted to double check with you. The first file that we received was identified as RFP_2. We never received an RFP_1.

In total we received eight files, as the title of your email suggested we would. The eight were:

RFP_2
RFP_3_part_I
RFP_3_part_II
RFP_3_part_III
RFP_5_Redacted
RFP_8
RFP_19
RFP_mis

Should we have received anything else? Specifically, should we have received an RFP_1?

Thanks you in advance for clarifying this point. [REDACTED] and I are working on a filing in response to the Epstein Motion for Protective Order that we may need to file in the next 24 hours, so we'd appreciate clarity on this point soon.

Thanks again for all your help.

[REDACTED] for Jane Doe #1 and Jane Doe #2



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Subject: Jane Does No. 1 and 2 [REDACTED], United States - Production of Documents, One of Eight



I will be sending you eight (8) files, broken into several e-mails. I have not gone through the Child Exploitation and Obscenity Section (CEOS) files, although I have included the May 15, 2008 letter from the CEOS Chief advising Epstein's attorneys that the United States Attorney was acting within his discretion in prosecuting the case. On the documents pertaining to Epstein's appeal to the Deputy Attorney General's Office, the documents produced are copies provided to our Office. There may be more at the Deputy Attorney General's Office, which has been notified of the Eleventh Circuit's decision.

