

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 08-80736-Civ-Marra/Matthewman

JANE DOES #1 AND #2,

Petitioners,

■.

UNITED STATES OF AMERICA,

Respondent.

_____ /

UNITED STATES' NOTICE OF FILING SUPPLEMENTAL PRIVILEGE LOG

Pursuant to the Court's June 18, 2013 Omnibus Order (DE 190), the Respondent, United States of America, by and through the undersigned Assistant United States Attorney, hereby gives notice of its filing of its Privilege Log, which is attached hereto.

The documents referenced in the Privilege Log are being delivered today to the Chambers of U.S. District Judge Kenneth A. Marra for *ex parte in camera* review, pursuant to the Court's Omnibus Order.

Respectfully submitted,

WIFREDO A. FERRER
UNITED STATES ATTORNEY

By:

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A large black rectangular redaction box covers the signature and name of the Assistant United States Attorney. To the left of the box, the letters 's', 'A', 'A', 'F', 'S', 'V', 'T', 'F', and 'a' are visible, likely representing the first letters of the signature and title.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 26, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. According to the Court's website, counsel for all parties are able to receive notice via the CM/ECF system.



SERVICE LIST

Jane Does 1 and 2 ■, United States,
Case No. 08-80736-CIV-MARRA/MATTHEWMAN
United States District Court, Southern District of Florida

Brad Edwards, Esq.,
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N Andrews Ave Ste 2



Paul G. Cassell
S.J. Quinney College of Law at the



Attorneys for Jane Doe # 1 and Jane Doe # 2

SUPPLEMENTAL PRIVILEGE LOG

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013279 Thru P-013280	8/15/08 Emails between A. Acosta and A. Marie Villafaña, R. Senior, D. Lee and K. Atkinson re proposed correspondence to Jay Lefkowitz	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013281	Handwritten note re Epstein investigation	Attorney-Client Privilege Work Product Investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013282 Thru P-013283	7/9/08 Email from A. Marie Villafaña to A. Acosta, J. Sloman, K. Atkinson, and FBI re proposed response to Goldberger letter re victim notification	Attorney-Client Privilege Work product Deliberative Process
Suppl. Box #3 P-013284	7/10/08 Emails between J. Sloman and A. Marie Villafaña, K. Atkinson, and FBI re proposed response to Goldberger's letter re victim notification	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013285 Thru P-013289	File folder entitled "8/5/08 AMCV e-mail re correct agrmt" containing 8/5/08 email from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson re "Jeffrey Epstein Agreement" discussing 6/24/08 email from A. Marie Villafaña to R. Black and J. Goldberger concerning the binding nature of the Agreement	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013290 Thru P-013292	File folder entitled "8/14/08 E-mail from Lefk to AMCV" containing (undated) emails from A. Marie Villafaña to R. Senior, J. Sloman, A. Acosta, K. Atkinson, D. Lee re draft response to 8/14/08 email from J. Lefkowitz regarding "the December 2007 proposal"	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013293 Thru P-013299	File folder entitled "8/15/08 AMCV e-mail re Agrmt" containing 8/15/08 e-mails from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson, D. Lee re follow up on Agreement and from A. Acosta to Ann Marie Villafana on issue of Special Master with attached 8/15/08 emails from A. Marie Villafaña to A. Acosta, J. Sloman, R. Senior, K. Atkinson, D. Lee re Agreement; 8/15/08 email from J. Lefkowitz to A. Marie Villafana, K. Atkinson, R. Black, M. Weinberg re Agreement; 8/14/08 emails from A. Marie Villafaña to J. Lefkowitz, K. Atkinson, R. Black re interpretation of Agreement; email from J. Lefkowitz to A. Marie Villafaña, K. Atkinson re questions re Agreement; email from A. Marie Villafaña to J. Lefkowitz, K. Atkinson re production of Agreement to victims	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013300 Thru P-013303	File folder entitled "8/18/08 Lefkowitz Ltr to AMCV" containing A. Marie Villafaña's handwritten draft notes for proposed letter to J. Lefkowitz; 5/22/07 e-mail from A. Lourie to M. Menchel, J. Sloman, A. Marie Villafaña re meeting with G. Lefcourt with attached email from G. Lefcourt re solicitation for meetings	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013304 Thru P-013325	File folder entitled "6/25/07 Lefcourt to Sloman & Lourie containing 6/25/07 letter (with handwritten notes by A. Marie Villafaña) from G. Lefcourt to J. Sloman, M. Menchel, A. Lourie, A. Marie Villafaña addressing reasons for not prosecuting Epstein; handwritten outline by A. Marie Villafaña of possible response to letter	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013326 Thru P-013329	File folder entitled "9/17/07 Villafaña to Lefkowitz containing 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Lourie and from R. Garcia to A. Marie Villafaña concerning status of plea negotiations	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013330 Thru P-013333	File folder entitled "11/8/07 Lefkowitz to Sloman" containing 11/8/07 letter from J. Lefkowitz re issues arising during pendency of matter with attorney handwritten notes	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013334 Thru P-013337	File folder entitled "11/13/07 Sloman to Lefkowitz (was this sent?)" containing draft 11/13/07 letter from J. Sloman responding to J. Lefkowitz's letter	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013338 Thru 013341	File folder entitled "12/6/07 Sloman to Lefkowitz" containing 12/5/07 faxed letter w/ cover sheet from K. Starr and J. Lefkowitz to A. Acosta	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box #3 P-013342 Thru P-013350	File folder entitled "12/05/07 Starr to Acosta" containing drafts of 11/30/07 letters from A. Acosta to K. Starr and from J. Sloman to J. Lefkowitz re performance and victim notification with handwritten notes and edits by A. Marie Villafaña	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-13351 Thru P-013361	File folder entitled "12/21/07 Lefkowitz to Acosta" containing handwritten notes by A. Marie Villafaña, 12/21/07 letter from J. Lefkowitz to A. Acosta re performance of NPA and appeal to Washington with attorney handwritten notes	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013362 Thru P-013366	File folder labeled "12/26/07 Lefkowitz to Acosta" containing 2 copies of draft letter from A. Acosta to J. Lefkowitz (with 12/28/07 fax header)	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013367 Thru P-013372	File folder labeled "Draft ltr from Sloman to Lefkowitz re termination" containing draft letter dated "April , 2008" from J. Sloman to J. Lefkowitz concerning the compliance with the Agreement	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013373 Thru P-013503	File folder labeled "6/3/08 Sloman Submission to the DAG" containing 6/3/08 letter from J. Sloman to Mark Filip, Office of the DAG, cc'd to R. Senior, A. Marie Villafaña, K. Atkinson, re Jeffrey Epstein, detailing events concerning the Agreement and thereafter and with relevant attachments	Attorney-Client Privilege Deliberative Process Work Product Investigative privilege
Suppl. Box #3 P-013504 Thru P-013507	File folder labeled "Mtg w/ Ken Starr, RAA, JS, Drew" containing handwritten notes by A. Marie Villafaña	Attorney-Client Privilege Work Product
Suppl. Box #3 P-013508 Thru P-013514	File folder labeled "Internal Corr." containing 11/28/07 e-mails from J. Sloman to A. Marie Villafaña re responding to 11/28/07 e-mail from J. Lefkowitz to J. Sloman regarding victim notification with attachments	Attorney-Client Privilege Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013515 Thru P-013525	Draft 11/30/07 letter from A. Acosta to K. Starr cc'd to J. Sloman and A. Marie Villafaña re compliance with Agreement and internal emails from J. Sloman, A. Acosta, and A. Lourie re items to address in letter	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013526 Thru P-013527	5/23/07 e-mail from A. Marie Villafaña to K. Atkinson re draft proposed internal e-mail about handling of case and attached email correspondence between Andrew Lourie and G. Lefcourt	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-013528 Thru P-013530 P-013532 Thru P-013537	Handwritten notes by A. Marie Villafana dated 9/21 re telephone conference with possible victim representative, conflict check with names and email listed, list of names of potential victim representatives, payment discussion, and guideline calculation, email containing contact info for potential victim representative, draft Non Prosecution Agreement dated 9/10/07 4:17 pm	Work Product
Suppl. Box #3 P-013531	Typed note addressed to "Dear David" re response to grand jury subpoena	6(e) Investigative privilege
Suppl. Box #3 P-013538 Thru P-013553	File folder labeled "Notes Re Post-Agreement Communications" containing handwritten notes by A. Marie Villafaña	Work Product Deliberative Process
Suppl. Box #3 P-013554 Thru	File folder labeled "E-mails Re Plea Negotiations" containing: ■ 11/28/07 e-mail from A. Lourie to A. Marie Villafaña, A. Oosterbaan, R. Garcia re non-prosecution agreement, with attached correspondence; ■ 9/19/07 e-mail from A. Marie Villafaña to A. Lourie, R. Garcia, K. Atkinson re negotiating strategy, with attached correspondence; ■ 9/18/07 e-mail from A. Marie Villafaña to A. Acosta, A. Lourie, R. Garcia, K. Atkinson, J. McMillan re negotiating strategy; ■ 9/17/07 e-mail from A. Marie Villafaña to A. Acosta re negotiation; ■ 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Acosta, A. Lourie, K. Atkinson, J. McMillan re negotiations; ■ 9/17/07 e-mail from A. Marie Villafaña to	Attorney-Client Privilege Work Product Deliberative Process Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
	R. Garcia, A. Lourie re negotiation strategy; ■ 9/14/07 e-mail from A. Marie Villafaña to J. Sloman, A. Acosta, R. Garcia, A. Lourie, K. Atkinson, S. Ball re proposed plea agreement and Information; ■ 9/14/07 e-mail from A. Marie Villafaña to J. Sloman, A. Acosta, A. Lourie, R. Garcia, K. Atkinson, J. McMillan, S. Ball re plea negotiations; ■ 9/13/07 e-mail from A. Marie Villafaña to K. Atkinson, S. Ball, J. McMillan re indictment package; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Oosterbaan re trust agreement with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Oosterbaan re trust agreement; ■ 9/13/07 e-mail from A. Marie Villafaña to R. Garcia, J. Sloman re conference call with J. Lefkowitz; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Lourie re plea negotiations with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Lourie re charging strategy with attached correspondence; ■ 9/13/07 e-mail from A. Marie Villafaña to K. Atkinson, S. Ball, J. McMillan re indictment package; ■ 9/13/07 e-mail from A. Marie Villafaña to A. Acosta, J. Sloman, R. Garcia, K. Atkinson, A. Lourie re plea negotiations; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Lourie re meeting w/ G. Lefcourt with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Lourie re revised Agreement with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to J. Sloman re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from A. Marie Villafaña to A. Oosterbaan re status of negotiations with attached correspondence;	

Bates Range	Description	Privilege(s) Asserted
	■ 9/10/07 e-mail from A. Marie Villafaña to J. Sloman re negotiations; 9/10/07 e-mail from A. Marie Villafaña to J. Sloman, J. McMillan re state grand jury proceedings; ■ 9/17/07 e-mail from A. Acosta to A. Marie Villafaña, R. Garcia, A. Lourie, K. Atkinson, J. McMillan re draft Agreement with attached correspondence; ■ 9/14/07 e-mail from J. Sloman to A. Marie Villafaña, A. Acosta, R. Garcia, A. Lourie, K. Atkinson, S. Ball, re finalizing documents; ■ 9/14/07 e-mail from A. Lourie to A. Marie Villafaña re charging strategy with attached correspondence; ■ 9/13/07 e-mail from A. Oosterbaan to A. Marie Villafaña re setting up trust fund; ■ 9/13/07 e-mail from A. Lourie to A. Marie Villafaña re final negotiations with attached correspondence; ■ 9/11/07 e-mail from A. Lourie to A. Marie Villafaña re scheduling a meeting regarding finalizing the agreement with attached correspondence; ■ 9/11/07 e-mail from J. Sloman to A. Marie Villafaña re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from J. Sloman to A. Marie Villafaña re non-prosecution agreement edits with attached correspondence; ■ 9/11/07 e-mail from A. Oosterbaan to A. Marie Villafaña re negotiations with attached correspondence; ■ 9/17/07 e-mail from A. Marie Villafaña to R. Garcia, A. Lourie re negotiation strategy	
Suppl. Box #3 P-013609 Thru P-013615	File folder entitled "[] Target Letter" containing copy of signed letter and contact info for counsel for target	6(e) Investigative Privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box #3 P-013616 Thru P-013621	File folder entitled "Atty Notes re Revised Indictment" containing handwritten notes by A. Marie Villafaña	Attorney-Client Privilege Deliberative Process Work Product Investigative Privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013622 Thru P-013643	File folder entitled "Research Re Possible Misdemeanors" containing attorney research	Work product
Suppl. Box #3 P-013644 Thru P-013653	File folder entitled "Notes Re Plea Negotiations" containing 9/17/07 e-mail from A. Marie Villafaña to J. Richards, N. Kuyrkendall re status update; undated and typed handwritten notes by A. Marie Villafaña re items to be completed on case, strength of case, victim interviews, summary of evidence, guidelines calculations	Attorney-Client Privilege Work Product Deliberative Process Investigative privilege Also contains information subject to privacy rights of victims who are not parties to this litigation
Suppl. Box #3 P-013654 Thru P-013745	File folder entitled "Plea Agreement Drafts" containing several draft plea agreements some with handwritten notes by A. Marie Villafaña; copies of draft non-prosecution agreement some with handwritten notes by A. Marie Villafaña; copy of a draft Information	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box #3 P-0013747 Thru P-013810	File folder entitled "Draft Non-Prosecution Agreements" containing several draft non-prosecution agreements some with handwritten notes by A. Marie Villafaña; plea sheet State Circuit Court; copies of draft Information; draft plea proffer; draft motion and order to seal; draft penalty sheet; draft plea agreement	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box 3 P-013811 Thru P-013833	File folder entitled "Information Packet Drafts" containing several drafts of Informations, and complete draft Information packet	Attorney-Client Privilege Work Product Deliberative Process
Suppl. Box 3 P-013834 Through P-013835	Two pages of filed document, D.E. 62, page 2 of 54 and page 6 of 54, containing handwritten attorney notes	atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013836 Thru P-013837	Palm Beach Daily News Article, "Attorneys want Jeffrey Epstein Agreement Thrown Out," with attorney's notes written on margin	Atty work-product
Suppl. Box 3 P-013838 Thru P-013841	Letter from Paul Cassell to Wifredo A. Ferrer, December 10, 2010, Subject: Request for Investigation of Jeffrey Epstein Prosecution, with underlines, written notes, and comments by DOJ attorney	Atty work-product
Suppl. Box 3 P-013842	Email from Dexterr Lee to Ruth Plagenhoef (OPR), February 25, 2011, 4:31 p.m., Re: Request for OPR Investigation – Jeffrey Epstein Non-Prosecution Agreement	Atty work-product Atty-client privilege
Suppl. Box 3 P-013843 Thru P-013844	E-mail, Marie Villafana to Andrew Lourie, Rolando Garcia, and Karen Atkinson, September 19, 2007, 4:33 p.m., RE: Plea Agreement	Atty work-product atty-client privilege
Suppl. Box 3 P-013845 Thru P-013846	E-mail, Andrew Lourie to Marie Villafana, September 19, 2007, 4:21 p.m., RE: Epstein, with internal U.S. Attorney's Office e-mails attached	Atty work-product
Suppl. Box 3 P-013847 Thru P-013849	E-mail, Marie Villafana to Andrew Lourie, Rolando Garcia, and Karen Atkinson, September 18, 2007, 11:43 a.m., RE: Draft Agreements?, with e-mail from Jay Lefkowitz (September 18, 2007, 11:09 a.m.) attached	Atty work-product
Suppl. Box 3 P-013850	E-mail, Marie Villafana to Alex Acosta, Andrew Lourie, Rolando Garcia, Karen Atkinson, and John McMillan, September 18, 2007, 9:31 a.m., RE: Epstein Negotiations	Atty work-product
Suppl. Box 3 P-013851 Thru P-013853	E-mail, Marie Villafana to Rolando Garcia and Andrew Lourie, September 17, 2007, 10:35 a.m., RE: Epstein [providing update re plea negotiations]	Atty work-product
Suppl. Box 3 P-013854	E-mail, Marie Villafana to Andrew Oosterbaan, September 13, 2007, 8:10 p.m., RE: Epstein, with e-mail from Andrew Oosterbaan (September 13, 2007, 7:54 p.m.), attached	Atty work-product
Suppl. Box 3 P-013855	E-mail, Marie Villafana to Jeff Sloman and Andrew Lourie, September 10, 2007, 5:24 p.m., RE: FBI	Atty work-product Atty-client privilege
Suppl. Box 3 P-013856 Thru P-013857	E-mail, Marie Villafana to Jeff Sloman, September 6, 2007, 5:47 p.m., RE: Epstein, with e-mail from Jeff Sloman (September 6, 2007, 5:35 p.m.), attached	Atty work-product Atty-client privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013858	Email, Marie Villafana to Jeff Sloman, September 6, 2007, 9:29 a.m., Re: Meeting on Friday	atty work-product
Suppl. Box 3 P-013859 Through P-013860	Email, Gerald Lefcourt to Marie Villafana, Lilly Ann Sanchez, Roy Black, re: Jeffrey Epstein	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box 3 P-013861 Thru P-013865	E-mail, Marie Villafana to Matthew Menchel, July 13, 2007, 3:14 p.m., RE: Epstein, with e-mail from Menchel (July 5, 2007, 3:30 p.m.), Villafana to Menchel (July 4, 2007, 5:16 p.m.), and Sloman to Villafana (July 3, 2007, 1:47 p.m.), attached	Atty work-product atty-client privilege
Suppl. Box 3 P-013866	E-mail, Marie Villafana to Jeff Sloman, Matthew Menchel, Andrew Lourie, Karen Atkinson, and Shawn Ball, July 3, 2007, 6:26 a.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013867 Thru P-013868	E-mail, Marie Villafana to Matthew Menchel, June 21, 2007, 3:24 p.m., RE: Meeting Next Week, with e-mails from Menchel to Villafana (June 21, 2007, 2:58 p.m.), and Villafana to Menchel (June 21, 2007, 1:37 p.m.), attached	Atty work-product
Suppl. Box 3 P-013869	E-mail, Marie Villafana to Matthew Menchel, Jeff Sloman, Andrew Lourie, and Karen Atkinson, June 18, 2007, 5:04 p.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013870 Thru P-013871	E-mail, Andrew Lourie to Marie Villafana, May 24, 2007, 9:25 a.m., FW: Jeffrey Epstein, with e-mail from Gerald Lefcourt to Andrew Lourie (May 23, 2007, 5:00 p.m.), Andrew Lourie to Gerald Lefcourt (May 22, 2007, 6:32 p.m.), and Gerald Lefcourt to Andrew Lourie Marie Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013872	E-mail, Andrew Lourie to Matthew Menchel, Jeff Sloman, and Marie Villafana, May 22, 2007, 3:11 p.m., FW: Jeffrey Epstein, with e-mail from Lefcourt to Lourie, Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013873	E-mail Menchel to Villafana and Lourie, May 14, 2007, 10:52 a.m., RE: Operation Leap Year, with e-mail from Villafana to Lourie and Menchel (May 14, 2007, 10:38 a.m.), attached	Atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013874 Through P-013875	Inadvertently marked as privileged, will be produced	
Suppl. Box 3 P-013876 Thru P-013877	E-mail, Villafana to Lourie, Garcia, and Atkinson, September 19, 2007, 4:33 p.m., RE: Draft Plea Agreement, with e-mail from Lefkowitz to Villafana (September 19, 2007, 3:44 p.m.), and Lefkowitz to Villafana (September 19, 2007, 3:35 p.m.) attached	Atty work-product
Suppl. Box 3 P-013878 Thru P-013879	E-mail, Lourie to Villafana, September 19, 2007, 4:21 p.m., RE: Epstein, with e-mails from Villafana to Lourie and Garcia (September 19, 2007, 4:13 p.m.), Villafana to Lourie and Garcia (September 19, 2007, 4:05 p.m.), and Lourie to Villafana and Garcia (September 19, 2007, 3:50 p.m.), Villafana to Lourie (September 19, 2007, 2:36 p.m.), Lourie to Villafana (September 19, 2007, 2:33 p.m.), and Villafana to Lourie and Garcia (September 19, 2007, 2:31 p.m.), attached	Atty work-product
Suppl. Box 3 P-013880 Thru P-013882	E-mail, Villafana to Lourie, Garcia, and Atkinson, September 18, 2007, 11:43 a.m., RE: Draft Agreements?, with e-mails from Villafana to Lourie, Garcia and Atkinson (September 18, 2007, 11:18 a.m.), Lefkowitz to Villafana (September 18, 2007, 11:09 a.m.), and Villafana to Lefkowitz (September 18, 2007, 9:14 a.m.), and Lefkowitz to Villafana (September 18, 2007, 8:59 a.m.), attached	Atty work-product
Suppl. Box 3 P-013883	E-mail, Villafana to Acosta, Lourie, Garcia, Atkinson, and McMillan, September 18, 2007, 9:31 a.m., RE: Epstein Negotiations	Atty work-product
Suppl. Box 3 P-013884 Thru P-013886	E-mail, Villafana to Garcia and Lourie, September 17, 2007 10:35 a.m., RE: Epstein, with e-mail from Garcia (September 17, 2007, 10:26 a.m.), attached	Atty work-product
Suppl. Box 3 P-013887	E-mail, Marie Villafana to Andrew Oosterbaan, September 13, 2007, 8:10 p.m., RE: Epstein, with e-mail from Andrew Oosterbaan (September 13, 2007, 7:54 p.m.), attached	Atty work-product
Suppl. Box 3 P-013888	E-mail, Marie Villafana to Jeff Sloman and Andrew Lourie, September 10, 2007, 5:24 p.m., RE: FBI	Atty work-product Atty-client privilege

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013889 Thru P-013890	E-mail, Marie Villafana to Jeff Sloman, September 6, 2007, 5:47 p.m., RE: Epstein, with e-mail from Jeff Sloman (September 6, 2007, 5:35 p.m.), attached	Atty work-product Atty-client privilege
Suppl. Box 3 P-013891	Email, Marie Villafana to Jeff Sloman, September 6, 2007, 9:29 a.m., Re: Meeting on Friday	atty work-product
Suppl. Box 3 P-013892 Through P-013893	Email, Gerald Lefcourt to Marie Villafana, Lilly Ann Sanchez, Roy Black, re: Jeffrey Epstein	[Not considered privileged. Will be produced to opposing counsel upon lifting of stay]
Suppl. Box 3 P-013894 Thru P-013898	E-mail, Marie Villafana to Matthew Menchel, July 13, 2007, 3:14 p.m., RE: Epstein, with e-mail from Menchel (July 5, 2007, 3:30 p.m.), Villafana to Menchel (July 4, 2007, 5:16 p.m.), and Sloman to Villafana (July 3, 2007, 1:47 p.m.), attached	Atty work-product atty-client privilege
Suppl. Box 3 P-013899	E-mail, Marie Villafana to Jeff Sloman, Matthew Menchel, Andrew Lourie, Karen Atkinson, and Shawn Ball, July 3, 2007, 6:26 a.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013900 Thru P-013901	E-mail, Marie Villafana to Matthew Menchel, June 21, 2007, 3:24 p.m., RE: Meeting Next Week, with e-mails from Menchel to Villafana (June 21, 2007, 2:58 p.m.), and Villafana to Menchel (June 21, 2007, 1:37 p.m.), attached	Atty work-product
Suppl. Box 3 P-013902	E-mail, Marie Villafana to Matthew Menchel, Jeff Sloman, Andrew Lourie, and Karen Atkinson, June 18, 2007, 5:04 p.m., RE: Epstein	Atty work-product
Suppl. Box 3 P-013903 Thru P-013904	E-mail, Andrew Lourie to Marie Villafana, May 24, 2007, 9:25 a.m., FW: Jeffrey Epstein, with e-mail from Gerald Lefcourt to Andrew Lourie (May 23, 2007, 5:00 p.m.), Andrew Lourie to Gerald Lefcourt (May 22, 2007, 6:32 p.m.), and Gerald Lefcourt to Andrew Lourie Marie Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product
Suppl. Box 3 P-013905	E-mail, Andrew Lourie to Matthew Menchel, Jeff Sloman, and Marie Villafana, May 22, 2007, 3:11 p.m., FW: Jeffrey Epstein, with e-mail from Lefcourt to Lourie, Villafana, and Lilly Ann Sanchez (May 22, 2007, 2:05 p.m.), attached	Atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013906	E-mail Menchel to Villafana and Lourie, May 14, 2007, 10:52 a.m., RE: Operation Leap Year, with e-mail from Villafana to Lourie and Menchel (May 14, 2007, 10:38 a.m.), attached	Atty work-product
Suppl. Box 3 P-013907 Through P-013908	Inadvertently marked as privileged, will be produced	
Suppl. Box 3 P-013909 Thru P-013911	Memorandum, Lisa Howard, Assistant Counsel, U.S. Department of Justice, Office of Professional Responsibility (OPR), to Ruth Plagenhoef, Acting Associate Counsel, OPR, undated, Subject: Recommendation	Deliberative Process Privilege; atty work-product
Suppl. Box 3 P-013912 Thru P-013914	Memorandum, Lisa Howard, Assistant Counsel, OPR, to Ruth Plagenhoef, Acting Associate Counsel, OPR, Subject: Recommendation, with handwritten note dated 5/4/11	Deliberative Process Privilege, atty work-product
Suppl. Box 3 P-013915 Thru P-013918	Memorandum, Lisa Howard, Assistant Counsel, OPR, to Ruth Plagenhoef, Acting Associate Counsel, OPR, Subject: Recommendation, with two post-it notes attached with handwritten attorney notations, and handwritten notations, underlines, and circled text throughout the body of the two page memorandum	Deliberative Process Privilege; atty work-product
Suppl. Box 3 P-013919 Thru P-013921	Draft letter, marked "Confidential", from Robin C. Ashton, Counsel, Office of Professional Responsibility to Wifredo A. Ferrer, United States Attorney, with handwritten corrections, strikethroughs, and added text	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013922 Thru P-013924	Draft Letter, marked "Confidential", from Robin C. Ashton, to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013925 Thru P-013927	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten correction	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013928 Thru P-013930	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013931 Thru P-013933	Draft Letter, from Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections, circled text, strikethroughs, and additional text	Deliberative Process Privilege Attorney Work Product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013934 Thru P-013936	Draft Letter, marked "Confidential," from Robin C. Ashton to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013937 Thru P-013939	Draft Letter, Robin C. Ashton to Professor Paul G. Cassell, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013940 Thru P-013942	Draft Letter, marked "Confidential: To Be Opened by Addressee Only," Robin C. Ashton to Wifredo A. Ferrer, with handwritten corrections	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013943	E-mail, Ruth Plagenhoef to Lisa Howard, May 5, 2011, 11:19 a.m., RE: Re-write of Epstein letters for your review, with e-mail from Lisa Howard to Ruth Plagenhoef (May 5, 2011, 11:08 a.m.), and Plagenhoef to Howard (May 5, 2011, 11:10 a.m.), and Howard to Plagenhoef (May 5, 2011, 10:41 a.m.), attached	Deliberative Process Privilege Attorney Work Product
Suppl. Box 3 P-013944	E-mail, Plagenhoef to Howard, May 5, 2011, 11:17 a.m., RE: Re-write of Epstein letters for your review, with e-mail from Howard to Plagenhoef (May 5, 2011, 11:08 a.m.), Plagenhoef to Howard (May 5, 2011, 11:01 a.m.), and Howard to Plagenhoef (May 5, 2011, 10:41), attached	Deliberative Process Privilege
Suppl. Box 3 P-013945	E-mail, Plagenhoef to Howard, May 4, 2011, 5:01 p.m., RE: draft letters in Epstein matter, with e-mail from Howard to Plagenhoef (May 4, 2011, 4:57 p.m.), attached	Deliberative Process Privilege
Suppl. Box 3 P-013946	E-mail, Plagenhoef to Robin C. Ashton, May 4, 2011, 4:08 p.m., RE: FYI on the Florida matter	Law Enforcement investigatory record, atty work product; deliberative process privilege
Suppl. Box 3 P-013947	E-mail, Paul Cassell to Plagenhoef, May 3, 2011, 12:23 p.m., RE: OPR Inquiry – request for information, with post-it note attached with handwritten attorney notes on telephone call between Plagenhoef and Howard with Dexter Lee and Marie Villafana	atty work product; law enforcement investigatory record
Suppl. Box 3 P-013948 Thru P-013951	E-mail, Plagenhoef to Howard and Robin C. Ashton, May 3, 2011, 12:30 p.m., FW: OPR Inquiry – request for information, with attached e-mails. Handwritten attorney notes on margin	atty work-product

Bates Range	Description	Privilege(s) Asserted
Suppl. Box 3 P-013952 Thru P-013953	E-mail, Dexter Lee to Ruth Plagenhoef, March 16, 2011, 10:52 a.m., RE: Referral of Cassell Request for Investigation, with e-mail from Paul Cassell to Dexter Lee and Marie Villafana (March 15, 2011, 7:21 p.m.), attached	atty work-product; atty-client privilege
Suppl. Box 3 P-013954 Thru P-013955	E-mail, Plagenhoef to Neil Hurley, OPR, December 16, 2010, 10:59 a.m., FW: OPR Referral – Allegation of Misconduct – U.S. Attorney’s Office, S.D.Fla., with e-mail from Dexter Lee to Plagenhoef (December 16, 2010, 10:22 a.m.), attached. Handwritten attorney notations.	atty work-product, atty-client privilege
Suppl. Box 3 P-013956 Thru P-013846	Fourteen (14) pages of handwritten attorney notes on case, telephone interviews with DOJ attorneys	atty work-product