

From: [REDACTED]
To: [REDACTED]

Subject: Re: E-mail to [REDACTED]

Date: Tue, 29 Jun 2010 17:55:03 +0000

Importance: Normal

Inline-Images: bclc.gif; bestlawyers.jpg; bclc249e.gif

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 [REDACTED]

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



Robert D. Critton Jr. - Attorney at Law

[REDACTED] West Palm Beach | FL 33401

[REDACTED] | www.bclclaw.com



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From: Connie Zaguirre, CP, FRP

Sent: Tuesday, June 29, 2010 1:23 PM

To: Robert D. Critton Jr.

Subject: E-mail to [REDACTED]

[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.
[REDACTED] West Palm Beach | FL 33401

[REDACTED] www.bclclaw.com

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