

**From:** [REDACTED]

**To:** "Robert D. Critton Jr." <rcrit@bclclaw.com>

**Subject:** RE: E-mail to [REDACTED]

**Date:** Wed, 30 Jun 2010 15:50:57 +0000

**Importance:** Normal

**Inline-Images:** image001.gif; image002.jpg

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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]  
Assistant U.S. Attorney  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401  
[REDACTED]

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**From:** Robert D. Critton Jr. [REDACTED]  
**Sent:** Wednesday, June 30, 2010 9:29 AM  
**To:** [REDACTED] (USAFLS)  
**Cc:** Michael J. Pike  
**Subject:** RE: E-mail to [REDACTED]

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, [REDACTED]



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**From:** [REDACTED]  
**Sent:** Wednesday, June 30, 2010 9:24 AM  
**To:** Robert D. Critton Jr.  
**Subject:** RE: E-mail to [REDACTED]

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  
500 S. Australian Ave, Suite 400  
West Palm Beach, FL 33401  
[REDACTED]

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**From:** Robert D. Critton Jr. [REDACTED]  
**Sent:** Tuesday, June 29, 2010 1:56 PM  
**To:** [REDACTED]  
**Subject:** RE: E-mail to [REDACTED]

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

[REDACTED]



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**From:** [REDACTED]  
**Sent:** Tuesday, June 29, 2010 1:55 PM  
**To:** [REDACTED]  
**Subject:** Re: E-mail to [REDACTED]

Can you deliver to our wpb office?

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**From:** Robert D. Critton Jr. [REDACTED]  
**To:** [REDACTED] (USAFLS)  
**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  
303 Banyan Boulevard | Suite 400 | West Palm Beach | FL 33401  
Phone: (561) 842-2820 | Fax: (561) 253-0164  
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**From:** [REDACTED]  
**Sent:** Tuesday, June 29, 2010 1:23 PM  
**To:** Robert D. Critton Jr.  
**Subject:** E-mail to [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

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