

From: "Brendan White" <[REDACTED]>

To: "[REDACTED]"

Subject: Re: Grand Jury Appearance

Date: Thu, 26 Jun 2008 14:38:19 +0000

Importance: Normal

Dear [REDACTED]

I understand that there has been a recent development with respect to Mr. Epstein in that he intends to plead guilty in Florida state court on Monday pursuant to a deferred prosecution agreement with your office that has already been executed. Since this would seem to obviate any need for [REDACTED] to testify, please let me know what is going on with respect to this Tuesday. Do we still need to come down there and, if so, will she receive court-ordered immunity? Thanks.

Brendan White

----- Original Message -----

From: [REDACTED]

To: [Brendan White](mailto:Brendan.White)

Sent: Monday, June 23, 2008 2:09 PM

Subject: RE: Grand Jury Appearance

Dear Mr. White:

Please feel free to make your own travel arrangements, but if you would like [REDACTED] travel costs to be reimbursed, they must be made through the government's approved agency on the approved carriers.

Regarding the immunity, at this point, without a written proffer from you regarding the substance of her anticipated testimony, I believe that the more prudent course will be to question [REDACTED] to determine the limits of her Fifth Amendment exposure and, if necessary, to apply to the Court at that time. If you provide me with a written proffer that summarizes her anticipated testimony and explains how she will be exposed to criminal liability, then I can make the motion ahead of time. Your written statement would be treated as an attorney statement made in the course of confidential plea discussions and related negotiations, and would be governed by Fed. R. Crim. P. 11(f) and Fed. R. Evid. 410.

[REDACTED]

From: Brendan White [mailto:brendan@whiwhi.com]

Sent: Monday, June 23, 2008 1:45 PM

To: [REDACTED]

Cc: [REDACTED]

Subject: Re: Grand Jury Appearance

We will be there, and I will make the travel arrangements. I am assuming that this will be done in connection with an order of immunity. Please let me know if that is correct so I can advise [REDACTED] Thanks.

Brendan White

----- Original Message -----

From: [REDACTED]

To: [Brendan White](mailto:Brendan.White)

Cc: [REDACTED]
Sent: Monday, June 23, 2008 11:27 AM
Subject: Grand Jury Appearance

Dear Mr. White:

[REDACTED] will need to appear before the grand jury on July 1st to give testimony. Please contact my assistant, [REDACTED] to make travel arrangements. I expect that [REDACTED] testimony will begin either in the late morning or early afternoon, but she should be available for the whole day.

Thank you.

[REDACTED]