

**From:** "KATHERINE W. EZELL" [REDACTED]  
**To:** [REDACTED]  
**Cc:** "ROBERT C. JOSEFSBERG" [REDACTED] "Amy Ederi"  
**Subject:** FW:  
**Date:** Thu, 05 Mar 2009 18:13:37 +0000  
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**Attachments:** 20090305120759829.pdf

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Hi [REDACTED] Sorry to have to bother you one more time. We are still trying to clarify the role of the attorney representative.

Paragraph 7B of the Addendum to the Non-Prosecution Agreement provides that "[t]he parties will jointly prepare a short written submission to the independent third party [Judge Davis] regarding the role of the attorney representative and regarding Epstein's Agreement to pay such attorney representative his or her regular customary hourly rate for representing such victims subject to the provisions of paragraph C, infra. "

Paragraph C then specifies that Epstein has agreed to pay the attorney representative unless "...if after consideration of potential settlements, an attorney representative elects to file a contested lawsuit pursuant to 18 USC sec. 2255 or elects to pursue any other contested remedy..."

The above attachment is entitled PROPOSAL FOR PROCEEDING ONCE ATTORNEY IS SELECTED. It reads as though it was your proposal. For instance, it says under paragraph 2, "The agents and I will contact the girls individually," etc. Indeed your and our contacts with the victims and the way we have proceeded all seem to comply with paragraphs 2-7. One of the primary disconnects we are having with Epstein counsel seems to fall within the billing procedures covered in paragraph 1 of your proposal.

My questions are these: Did you and Epstein's lawyers agree on a joint submission to Judge Davis? If not, did the defense team submit it's own separate proposal to Judge Davis? Did Judge Davis adopt any submissions or protocol?

If you have a defense proposal, a joint proposal or protocol adopted by Judge Davis, could you please provide them to us? If not, should we contact Judge Davis and inquire if he received a separate proposal from the defense and what procedure, if any, he adopted?

Thank you, Kathy