

Privilege Log – Dated 2-23-2011

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Team			privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03089-03099	05/03/2009	Attorneys and Staff		RE: Setting Depos	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13445-13453	08/19/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
12281-12291	07/30/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09337-09340	08/10/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09350	10/21/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09335	08/06/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11983	08/06/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11984-11988	08/06/2009			Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00146	06/29/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00147	06/29/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00148	04/22/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00149	04/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00150	04/24/2009	Litigation Team	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00151-00152	06/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
01036-01039	04/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13313-13314	07/30/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					lead to the discovery of admissible evidence;protected by privacy rights
13315	08/03/3009	[REDACTED]	[REDACTED]	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
01080-01081	06/22/2009	[REDACTED]	[REDACTED]	Jane Doe brother	Attorney/Client privilege and/or work product
01077	05/28/2009	[REDACTED]	[REDACTED]	Doe family member	Attorney/Client privilege and/or work product
02445-02446	05/05/2009	[REDACTED]	[REDACTED]	Jones v. Atlantic asphalt	Attorney/Client privilege and/or work product
03049	09/21/2009	[REDACTED]	[REDACTED]	New addition to the case	Attorney/Client privilege and/or work product
02425-02426	06/17/2009	[REDACTED]	[REDACTED]	Jane Doe v. Dukenik	Attorney/Client privilege and/or work product
02669	09/24/2009	[REDACTED]	[REDACTED]	Subpoena for [REDACTED]	Attorney/Client privilege and/or work product
02647	08/06/2009	[REDACTED]	[REDACTED]	Samantha Lee Rivera info	Attorney/Client privilege and/or work product
03688-03691	04/03/2009	[REDACTED]	[REDACTED]	Case number assignments	Attorney/Client privilege and/or work product
03692-03693	05/06/2009	[REDACTED]	[REDACTED]	Case list	Attorney/Client privilege and/or work product
15678-15680	09/29/2009	[REDACTED]	[REDACTED]	Subpoena for [REDACTED]	Attorney/Client privilege and/or work product
15689	10/01/2009	[REDACTED]	[REDACTED]	Client information	Attorney/Client privilege and/or work product
02546-02547	09/22/2009	[REDACTED]	[REDACTED]	Client communication	Attorney/Client privilege and/or work product
02809-02810	09/28/2009	[REDACTED]	[REDACTED]	Client communication	Attorney/Client privilege and/or work product
02262	07/23/2009	[REDACTED]	[REDACTED]	Discussion re: client/victim personal information	Attorney/Client privilege and/or work product
02807-02808	10/01/2009	[REDACTED]	[REDACTED]	Client communication	Attorney/Client privilege and/or work product
03760-03828	04/01/2009	[REDACTED]	[REDACTED]	Client names/types of action/client information	Attorney/Client privilege and/or work product, privacy right privilege, not relevant
03759	04/01/2009	[REDACTED]	[REDACTED]	Conflict Check for [REDACTED] files	Attorney/Client privilege and/or work product
08358-08359	09/14/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
08364-08368	10/01/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
08370	09/14/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
08374-08375	10/01/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
03878	06/12/2009	[REDACTED]	[REDACTED]	Curtis Rivera	Attorney/Client privilege and/or work product
02955	04/20/2009	[REDACTED]	[REDACTED]	Juskowich	Attorney/Client privilege and/or work product
02932	07/17/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
11544-11545	09/28/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
07432-07435	09/25/2009	[REDACTED]	[REDACTED]	New addition to the case	Attorney/Client privilege and/or work product
06906-06909	07/17/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
06913-06914	06/22/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
06030-06031	05/04/2009	[REDACTED]	[REDACTED]	Espina – Walmart case	Attorney/Client privilege and/or work product
05646	07/08/2009	[REDACTED]	[REDACTED]	Client meeting	Attorney/Client privilege and/or work product
05573	09/18/2009	[REDACTED]	[REDACTED]	Client meeting	Attorney/Client privilege and/or work product
05540	07/31/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
05273-05276	07/28/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
05264	07/27/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
05267-05270	07/27/2009	[REDACTED]	[REDACTED]	Client info	Attorney/Client privilege and/or work product
02933	06/17/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
01292	09/18/2009	[REDACTED]	[REDACTED]	Epstein article	Attorney/Client privilege and/or work product
01068-01070	04/02/2009	All Staff	[REDACTED]	Current case list of [REDACTED]	Attorney/Client privilege and/or work product
01054-01055	04/02/2009	All Staff	[REDACTED]	Updated case list for [REDACTED]	Attorney/Client privilege and/or work product
01033	05/06/2009	[REDACTED]	[REDACTED]	case list	Attorney/Client privilege and/or work product
01030-01031	04/03/2009	[REDACTED]	[REDACTED]	Case number assignments	Attorney/Client privilege and/or work product

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01118-01120	09/22/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
01986-01989	04/02/2009	[REDACTED]	[REDACTED]	Conflict check	Attorney/Client privilege and/or work product
01984-01985	04/02/2009	[REDACTED]	[REDACTED]	Conflict check	Attorney/Client privilege and/or work product
25925	09/30/2009	All Staff	[REDACTED]	Conflict check	Attorney/Client privilege and/or work product
25874	09/30/2009	All Staff	[REDACTED]	Additional name added to conflict check	Attorney/Client privilege and/or work product
08356-08357	09/16/2009	[REDACTED]	[REDACTED]	Client Meeting	Attorney/Client privilege and/or work product
16760-16761	09/23/2009	[REDACTED]	[REDACTED]	New Client	Attorney/Client privilege and/or work product
08005	06/05/2009	[REDACTED]	[REDACTED]	New Client	Attorney/Client privilege and/or work product
06915-06920	06/17/2009	MG	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
08360-08363	09/16/2009	[REDACTED]	[REDACTED]	Client Meeting	Attorney/Client privilege and/or work product
04101-04107	09/28/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
04708-04710	09/18/2009	[REDACTED]	[REDACTED]	Epstein Article	Attorney/Client privilege and/or work product
06910-06912	06/17/2009	[REDACTED]	[REDACTED]	Jane Doe v. Roe	Attorney/Client privilege and/or work product
07909	08/10/2009	Jane Doe	[REDACTED]	Same silver car tag	Attorney/Client privilege and/or work product
07637-07642	09/10/2009	[REDACTED]	[REDACTED]	Interview	Attorney/ Client Privilege
06795-06799	08/19/2009	Anthony P	[REDACTED]	Client Meeting	Attorney/Client privilege and/or work product
06542-06548	09/15/2009	[REDACTED]	[REDACTED]	Client Meeting	Attorney/Client privilege and/or work product
06404-06408	09/10/2009	[REDACTED]	[REDACTED]	Interview	Attorney/Client privilege and/or work product
08338-08339	09/16/2009	[REDACTED]	[REDACTED]	New Client	Attorney/Client privilege and/or work product
08505	09/14/2009	[REDACTED]	[REDACTED]	New Client Meeting	Attorney/Client privilege and/or work product
02241-02242	05/28/2009	Confidential Source	[REDACTED]	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02243-02244	07/07/2009	[REDACTED]	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02238-02240	05/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02204	07/14/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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[REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
02298-02299	07/08/2009	[REDACTED]	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02291	06/04/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02442-02443	08/17/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02440-02441	10/02/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04318-04321	09/24/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05111	06/02/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05152	06/03/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05164	06/03/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05166	06/03/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05169-05170	06/03/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05173-05174	06/03/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05212-05213	06/23/2009	Confidential Source	[REDACTED]	Secret Plea Deal for Epstein Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05215-05217	06/23/2009	Confidential Source	[REDACTED]	Secret Plea Deal of Epstein providing new witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05175-05189	07/02/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05194-05196	06/23/2009	[REDACTED]	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05204-05206	06/23/2009	[REDACTED]	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05227-05228	07/08/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05230-05231	07/08/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05303	08/06/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05344-05346	06/23/2009	[REDACTED]	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05408	07/06/2009	[REDACTED]	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05425-05429	05/28/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05433-05436	05/29/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05433-05436	05/29/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05446	07/07/2009	[REDACTED]	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05452-05464	05/29/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05535-05536	07/30/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05538-05539	07/30/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05550-05551	08/11/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05577-05578	08/22/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05619-05620	09/18/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05650	08/06/200	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05688-05689	0/28/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
05693-05695	05/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05698	08/21/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05706-05709	05/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05720-05721	05/29/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05738-05739	05/29/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05743-05745	05/29/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05754	08/03/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05759-05762	06/01/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05765-05768	06/23/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05771-05773	06/03/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05777-05779	06/03/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05784-05786	06/03/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05791-05794	06/03/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05803	07/22/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05836-05837	07/08/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05842-05843	07/08/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05848	07/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05852-05853	07/29/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05857-05858	07/31/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05952-05953	08/25/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06192-06197	06/23/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06198-06201	06/24/2009	Confidential Source	[REDACTED]	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06203	07/23/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06401	09/23/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06643-06651	09/17/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06788-06789	09/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06942-06943	09/26/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06953	08/14/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06955-06957	10/02/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06959-06961	08/11/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06963-06980	08/11/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06986-06989	10/03/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07010-07014	10/04/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
07017-07018	09/04/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07143-07144	10/01/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07147-07150	09/18/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
075089-07513	10/13/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07605-07615	09/07/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07646-07647	09/08/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07674-07697	09/08/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08376	10/04/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08380	09/18/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08427-08430	09/24/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08450	05/17/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08507	10/03/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
10092-10098	08/31/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01610	06/03/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01612	06/04/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01451-01458	05/27/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01608	07/03/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01606	07/02/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01510	08/25/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01506	08/24/2009	Confidential Source	[REDACTED]	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01493	08/10/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01488	08/03/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01486	07/28/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01483	07/28/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01479	07/22/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01449	05/22/2009	[REDACTED]	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01433	10/20/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
15207-15208	08/14/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19716-19719	09/25/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19730-19731	10/02/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01683	08/06/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01693	08/21/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03011	09/17/2009	[REDACTED]	Confidential Source	Additional Information RE:	W/P Priv.; not reasonably calculated to lead to

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				Epstein Molestations	discovery of admissible evidence
01755-01756	10/02/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01756	06/22/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01770	10/08/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03126	09/18/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02006	06/23/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02060	09/23/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03487-03494	09/19/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02269	08/26/2009	Confidential Source	[REDACTED]	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02322-02323	10/16/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02595-02596	09/07/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02866-02867	09/25/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02895	08/31/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02901	09/16/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03032	09/18/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03057	10/13/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03070	07/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
03081-03082	09/21/2009	[REDACTED]	Confidential Source	Providing Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03144	10/08/2009	Confidential Source	[REDACTED]	Providing Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03189-03190	10/14/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Strategies	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04015	09/08/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02913	09/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02956-02957	08/31/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02975	10/21/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04031-04055	08/12/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04057	08/11/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04060	08/12/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02979-02980	10/02/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02998	07/21/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05626	10/12/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05630-05631	10/12/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05664-05665	10/12/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07976	08/14/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06655	06/09/2009	Confidential	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Source			discovery of admissible evidence
19986-19987	09/28/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04905-04906	07/15/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04946-04951	10/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05148	05/22/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05151	05/26/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05161	05/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05203	06/23/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05207-05208	06/23/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05220-05221	06/23/2009	Confidential Source	[REDACTED]	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05224-05225	06/24/2009	Confidential Source	[REDACTED]	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05239	06/23/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05277-05278	06/23/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05324-05325	06/23/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05368-05369	06/23/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05387-05388	06/23/2009	[REDACTED]	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02811-02812	10/03/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01280-01288	09/18/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
01131-01134	10/08/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
00988	04/25/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10163-10167	08/12/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10181-10188	08/12/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10245-10251	09/08/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10364-10367	09/17/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10586-10591	09/24/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10625-10632	10/02/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10698-10699	10/13/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10718-10719	10/13/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10927-10937	05/28/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10945-10954	05/29/2009	[REDACTED]	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10964-10978	06/02/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10991	06/22/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11006-11010	06/23/2009	[REDACTED]	Confidential Source	Additional Information RE:	W/P Privilege; Not reasonably calculated to lead

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				Epstein Molestations	to discovery of admissible evidence.
11075-11076	07/29/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11080-11082	07/31/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11085-11097	09/04/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11123-11136	09/17/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11140-11142	10/04/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11150-11151	10/12/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10390-10393	09/19/2009	[REDACTED]	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11157-11165	10/25/2009	Confidential Source	[REDACTED]	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11170-11174	06/23/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11184-11185	05/27/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11188-11195	05/28/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11198-11200	05/28/2009	[REDACTED]	Confidential Source	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11208-11214	05/29/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11223-11236	06/01/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11260-11266	06/24/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11320-11325	07/30/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
11372-11373	08/11/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11380-11383	08/12/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11438-11442	09/17/2009	Confidential Source	[REDACTED]	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11549-11550	10/01/2009	Confidential source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11574-11579	10/13/2009	Confidential Source	[REDACTED]	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
BOX 2					

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
08029-08032	09/14/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08026-08028	05/01/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07738-07739	05/13/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07747	09/17/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07758-07759	05/05/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
07760-07765	09/11/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07766	10/11/2009	[REDACTED]	Attorneys at [REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07767-07784	05/01/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07785-07790	06/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07791	04/04/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07792-07793	04/01/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07794-07841	04/04/2009	[REDACTED]	[REDACTED]	Full draft of motion to stay	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07842-07848	06/16/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
05320-05323	07/30/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05312-05313	07/22/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05306-05307	07/22/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05302	07/22/2009	Attorney at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05281	08/03/2009	[REDACTED]	[REDACTED]	Review of litigation materials	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05282-05283	04/09/2009	[REDACTED]	[REDACTED]	Jane Doe v. Us	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05288-05291	07/22/2009	[REDACTED]	[REDACTED]	Dr. Swan	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05292	07/22/2009	Attorneys at [REDACTED]	[REDACTED]	RE: Epstein Meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privacy rights
05295-05297	07/23/2009	Attorneys at [REDACTED]	[REDACTED]	RE: Epstein Conference Room Reserved	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05298	08/03/2009	[REDACTED]	[REDACTED]	Discussion of Epstein strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05261	07/23/2009	[REDACTED]	[REDACTED]	Victim Psychological Assessment	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18358-18359	07/24/2009	[REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04431-04432	08/14/2009	[REDACTED]	[REDACTED]	RE: Epstein-Maxwell Subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04419-04420	04/09/2009	[REDACTED]	[REDACTED]	RICO Statement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04403-04416	10/17/2009	[REDACTED]	[REDACTED]	Punitive Damages	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04387-04402	08/19/2009	[REDACTED]	[REDACTED]	Victim Complaints, Forensic accountants, & Epstein's Fraudulent Transfers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
04202-04206	09/08/2009	[REDACTED]	[REDACTED]	Epstein's attorneys & Bob Josephsberg have filed several motions on limits of the no contact order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04207-04215	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Letter to Critton RE: Protective Order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04191-04193	09/04/2009	[REDACTED]	[REDACTED]	Finding out who is protected by the order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04194-04195	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Seek Court Intervention	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04196-04199	09/08/2009	[REDACTED]	[REDACTED]	Finding out who is protected by the order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25937	10/25/2009	[REDACTED]	[REDACTED]	Epstein's house staff	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25923	09/09/2009	Attorneys at [REDACTED]	Maribel Matiska	legal opinion RE: Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25832-25838	06/01/2009	[REDACTED]	[REDACTED]	contact information re: who is pertinent to the case	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25825-25826	10/05/2009	[REDACTED]	[REDACTED]	Trial Prep Epstein	W/P; Attorney Client Privilege; Irrelevant and

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19856	10/17/2009	[REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20888	09/12/2009	[REDACTED]	[REDACTED]	Potential New witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20946	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05807-05810	07/23/2009	Attorneys at [REDACTED]	[REDACTED]	Conference room reserved	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05262-05263	07/22/2009	[REDACTED]	[REDACTED]	Investigator information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25829	05/11/2009	[REDACTED]	[REDACTED]	Motion to unseal criminal records	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25830-25831	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25811-25813	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
25815-25822	06/01/2009	[REDACTED]	[REDACTED]	Depo information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18358-18359	07/24/2009	[REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05382	09/12/2009	[REDACTED]	[REDACTED]	Potential new witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08033-08070	10/23/2009	Attorneys at [REDACTED]	[REDACTED]	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25997	10/23/2009	[REDACTED]	[REDACTED]	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
26741-26763	10/23/2009	Attorneys at [REDACTED]	[REDACTED]	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25774-25777	05/12/2009	[REDACTED]	[REDACTED]	Filed Motions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18177-18179	08/24/2009	[REDACTED]	[REDACTED]	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privacy rights
18174-18176	08/24/2009	[REDACTED]	[REDACTED]	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18172-18173	08/24/2009	[REDACTED]	[REDACTED]	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18170	08/24/2009	[REDACTED]	[REDACTED]	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03106	06/03/3009	[REDACTED]	[REDACTED]	Epstein Case Info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02593-02594	05/13/2009	[REDACTED]	[REDACTED]	Discussion with secretary regarding client information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08014	Undated	Unknown Staff	[REDACTED]	Miscellaneous case info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
27494	10/23/2009	Attorneys at [REDACTED]	[REDACTED]	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18166-18167	08/04/2009	[REDACTED]	[REDACTED]	Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16795-16796	10/01/2009	[REDACTED]	[REDACTED]	Trump Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16455-16759	09.10/2009	[REDACTED]	[REDACTED]	Depo Dates	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16436-16437	09/09/2009	[REDACTED]	[REDACTED]	Dershowitz Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16400-16404	09/02/2009	[REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16394-16395	08/31/2009	[REDACTED]	[REDACTED]	Depo Dates	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01046	08/25/2009	[REDACTED]	[REDACTED]	Computer information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01048-01050	07/28/2010	[REDACTED]	[REDACTED]	Hard drive of Plaintiff's computer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01052	09/09/2009	Attorneys at [REDACTED]	Maribel Matiska	legal Opinion RE: Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
01100	10/19/2009	[REDACTED]	[REDACTED]	Dershowitz Involvement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01105	08/11/2009	[REDACTED]	[REDACTED]	Potential New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01111	05/13/2009	[REDACTED]	[REDACTED]	Legal research	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01112-01117	05/12/2009	[REDACTED]	[REDACTED]	Dr. Swan	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01139-01142	04/29/2009	Staff	[REDACTED]	Epstein Depo revised	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01151	09/11/2009	[REDACTED]	[REDACTED]	Motion for protective order final draft	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01167	09/11/2009	[REDACTED]	[REDACTED]	Epstein MPO	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01216	05/21/2009	[REDACTED]	[REDACTED]	Immunity for testimony about prostitution	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privacy rights
01247	09/30/2009	[REDACTED]	[REDACTED]	Therapy Notes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01268-01269	10/22/2009	[REDACTED]	[REDACTED]	Epstein meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01293	08/19/2009	[REDACTED]	[REDACTED]	Epstein Assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01299	04/21/2009	[REDACTED]	[REDACTED]	Order denying the motion to reassign or transfer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01305	08/24/2009	[REDACTED]	[REDACTED]	Epstein Computers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01313	09/02/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01333	08/03/3009	[REDACTED]	[REDACTED]	Epstein Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01335	08/03/2009	[REDACTED]	[REDACTED]	Investigation into Epstein planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
01337	08/10/2009	[REDACTED]	[REDACTED]	Epstein Depo list	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01363	09/08/2009	[REDACTED]	[REDACTED]	Motion to freeze assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01414-01416	98/18/2009	[REDACTED] & [REDACTED]	[REDACTED]	Epstein Potential Witness List	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01417	08/24/2009	[REDACTED]	[REDACTED]	Potential Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01429	09/09/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein telephone conference today	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01431	07/31/2009	[REDACTED]	[REDACTED]	Epstein case info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01432	09/15/2009	[REDACTED]	[REDACTED]	New Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01434	10/19/2009	[REDACTED]	[REDACTED]	Epstein Evidence	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01461	04/27/2009	[REDACTED]	[REDACTED]	Epstein Info	W/P; Attorney Client Privilege; Irrelevant and

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01466	07/31/2009	[REDACTED]	[REDACTED]	Epstein Presentation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01471	07/18/2009	[REDACTED]	[REDACTED]	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01480	07/22/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein Meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01482	07/24/2009	[REDACTED]	[REDACTED]	Investigation into Epstein planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01491	08/10/2009	[REDACTED]	[REDACTED]	Investigative fees	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01492	08/10/2009	[REDACTED]	[REDACTED]	The Mar-a-Lago Club Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01495	08/11/2009	[REDACTED]	[REDACTED]	Potential Witness	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01498	08/17/2009	[REDACTED]	[REDACTED]	Legal opinion re:Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01628	06/15/2009	[REDACTED]	[REDACTED]	Investigations	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01635	05/21/2009	[REDACTED]	[REDACTED]	Personal Conversation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01636	06/23/2009	[REDACTED]	[REDACTED]	Motion to unseal	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01638	06/29/2009	[REDACTED]	[REDACTED]	Litigation Strategy RE: Motion to unseal	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01644	07/06/2009	Confidential Source	[REDACTED]	Request for admission	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01646	07/06/2009	Confidential Source	[REDACTED]	Secret Plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01648	07/11/2009	[REDACTED]	[REDACTED]	Investigating Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01650	07/13/2009	[REDACTED]	[REDACTED]	Epstein's Assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01658-01659	07/18/2009	[REDACTED]	[REDACTED]	DOJ	W/P; Attorney Client Privilege; Irrelevant and

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
01692	09/12/2009	[REDACTED]	[REDACTED]	Proposal for settlement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01698	05/05/2009	[REDACTED]	[REDACTED]	Epstein Victim Depos	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01702	09/17/2009	[REDACTED]	[REDACTED]	Epstein Depos	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01705	05/14/2009	[REDACTED]	[REDACTED]	Statutory Rape	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01711	04//01/2009	[REDACTED]	[REDACTED]	Third party subs	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01737	07/14/2009	[REDACTED]	[REDACTED]	Facebook/Myspace	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01564	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	Investigation Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01603	10/15/2009	[REDACTED]	Adam Horowitz	Testimony RE: Vehicles	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
04237-04242	06/15/2009	[REDACTED]	[REDACTED]	Epstein secret plea deal with Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04246	06/15/2009	[REDACTED]	[REDACTED]	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04250	06/15/2009	[REDACTED]	[REDACTED]	Epstein Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04255-04256	06/15/2009	[REDACTED]	[REDACTED]	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04260	06/15/2009	[REDACTED]	[REDACTED]	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04523	05/14/2009	[REDACTED]	[REDACTED]	Investigating Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05088-05090	10/27/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein's assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05108	04/01/2009	[REDACTED]	[REDACTED]	Victims employment	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02728-02729	08/04/2009	[REDACTED]	Spencer Kuvin	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02746	07/22/2009	[REDACTED]	Adam Steinberg	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02813-02814	08/26/2009	[REDACTED]	[REDACTED]	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02817-02826	08/04/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02827-02832	05/12/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02833-02835	08/23/2009	[REDACTED]	[REDACTED]	Other Rape Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02874-02876	05/23/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02887-02888	08/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03050-03052	10/16/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03053	10/17/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03054	10/13/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03056	09/04/2009	[REDACTED]	[REDACTED]	Other Rape Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03072	06/22/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03073	09/01/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03074-03075	10/28/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03100	10/15/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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[REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

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03197-03199	08/14/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03205-03211	09/13/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03212	08/11/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03213	10/28/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03214-03218	10/27/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03223-03232	04/15/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03233-03242	09/28/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03245	06/01/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03251-03252	09/24/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privacy rights
03524	09/04/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03525-03530	09/05/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03532	08/24/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03536	07/19/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03539-03540	08/26/2009	[REDACTED]	[REDACTED]	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03541-03544	10/12/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03545-03547	06/26/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03548-03549	04/11/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
03550-03574	09/09/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03575-03588	10/19/2009	[REDACTED]	[REDACTED]	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03589-03604	04/11/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03605-03606	10/16/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03607-03610	10/16/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03611-03612	10/16/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03613-03615	10/29/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03616-03618	10/01/2009	[REDACTED]	[REDACTED]	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03628-03637	09/15/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03638-03641	09/08/2009	[REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08454	10/23/2010	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08118-08123	10/23/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08124-08156	10/23/2009	Attorneys at [REDACTED]	Steven [REDACTED]	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02411-02413	05/12/2009	Attorneys at [REDACTED]	[REDACTED]	Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01913-01914	06/15/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80893-KAM Doe v. Epstein Motion to Dismiss	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01918- 01919	04/15/2009	Attorneys at [REDACTED]	[REDACTED]	Activity in case 9:08-cv-80893-KAM Doe v. Epstein Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01920-01924	05/20/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80994-KAM Jane Doe No. 6 v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
				Motion to Strike	to the discovery of the admissible evidence; protected by privacy rights
01925	08/26/2009	[REDACTED]	[REDACTED]	[REDACTED] Surveillance/Interview	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01928-01929	08/03/2009	[REDACTED]	[REDACTED]	Alfredo Rodriguez address	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01930	09/05/2009	[REDACTED]	[REDACTED]	Client info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01940	09/10/2009	[REDACTED]	[REDACTED]	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01944-01952	04/10/2009	[REDACTED]	[REDACTED]	Epstein assets	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01969	05/04/2009	[REDACTED]	[REDACTED]	Call from sources of information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01971-01972	05/13/2009	Attorneys at [REDACTED]	[REDACTED]	[REDACTED] Draft	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01973-01974	07/23/2009	[REDACTED]	[REDACTED]	[REDACTED] vs. Epstein – new investigator info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED] & [REDACTED]

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02023	05/14/2009	Attorneys at [REDACTED]	[REDACTED]	[REDACTED] deposition of Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02045-02046	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	[REDACTED] Doe v. Epstein – Letter from Bob Critton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02049-02053	09/04/2009	[REDACTED]	[REDACTED]	[REDACTED] Doe v. Epstein – Letter from Bob Critton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02063-02064	05/19/2009	[REDACTED]	[REDACTED]	Epstein – Confirming [REDACTED] Dial in Telephone Conference for Monday , 6/8/09 at 2:00 p.m.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02089-02090	09/17/2009	[REDACTED]	[REDACTED]	Epstein hearing	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02091-02092	06/16/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein – Monthly Call in Telephone Conference	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02106-02108	04/29/2009	[REDACTED]	[REDACTED]	Epstein – Telephone Conference	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02109	05/13/2009	[REDACTED]	[REDACTED]	Epstein info – List of Plaintiff lawyers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02110-02111	09/15/2009	[REDACTED]	[REDACTED]	Epstein - Cancelling depositions	Work product; attorney/client privilege;

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
		[REDACTED]		in New York for the following week	irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02112-02116	09/10/2009	[REDACTED]	[REDACTED]	Epstein – Yearbook picture of Epstein rape victims	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02117-02118	10/23/2009	[REDACTED]	[REDACTED]	Epstein (AUSA)	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02119-02121	09/08/2009	[REDACTED] S.	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02130-02137	05/26/2009	[REDACTED]	[REDACTED]	Epstein cases- depositions in federal cases	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02138-02139	08/04/2009	[REDACTED]	[REDACTED]	Epstein depo – New York	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02143-02146	09/28/2009	[REDACTED]	[REDACTED]	Epstein Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02229	05/05/2009	[REDACTED]	[REDACTED]	Epstein Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02236-02337	05/20/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
02256-02257	07/22/2009	[REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02260-02261	07/22/2009	[REDACTED]	[REDACTED]	Epstein – coordinating meetings	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02263-02265	07/23/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02266	07/30/2009	[REDACTED]	[REDACTED]	Epstein – Video Deposition of [REDACTED] in NY	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02273-02276	09/18/2009	[REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02278-02279	07/23/2009	[REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02284-02855	05/11/2009	[REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01769	10/30/2009	[REDACTED]	[REDACTED]	Barbara Berg info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
01780	09/14/2009	[REDACTED]	[REDACTED]	Discussion of belief that Epstein is transferring assets to avoid judgments	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01787-01788	09/04/2009	[REDACTED]	[REDACTED]	1. Accountants 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01799-01801	10/14/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Notification of ninety days expiring	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01804-01805	09/04/2009	[REDACTED] S.	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Order on motion for Medical Exam	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01806-01807	09/09/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Motion for protective order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01808-01809	09/10/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein - Order on Motion for Extension of Time to File Response/Reply/Answer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01810-01816	09/09/2009	Attorneys at [REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Response to Motion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01817-01818	06/11/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Response to motion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
01840-01841	07/16/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Order on Motion to Stay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01867-01868	09/28/2009	[REDACTED]	[REDACTED]	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Notice (Other)	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03662-03663	08/10/2009	Attorneys at [REDACTED]	[REDACTED]	Meeting with clients	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03664-03668	09/18/2009	[REDACTED]	[REDACTED]	Litigation strategy and preparation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08166-08168	10/28/2009	[REDACTED]	[REDACTED]	Weds filing	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08169-08170	08/06/2009	[REDACTED]	[REDACTED]	Wexner deposition for 14th	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08190-08196	04/07/2009	[REDACTED]	[REDACTED]	Motion to unseal/Motion to stay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08265-08300	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Witness Information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08377-08378	10/02/2009	[REDACTED]	[REDACTED]	Zorro Trust research info.	Work product; attorney/client privilege;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
08441-08446	10/05/2009	Attorneys at [REDACTED]	[REDACTED], [REDACTED]	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03672-03673	06/26/2009	[REDACTED]	[REDACTED]	Brunel information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03706-03718	08/05/2009	[REDACTED]	[REDACTED], [REDACTED]	Cf. Response to Motion to File Epstein Affidavit	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03737	08/25/2009	[REDACTED]	[REDACTED]	Computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03746-03753	08/02/2009	[REDACTED]	[REDACTED], [REDACTED]	Computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02335-02338	05/08/2009	[REDACTED], [REDACTED]	[REDACTED]	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02360-02361	06/09/2009	[REDACTED], [REDACTED]	[REDACTED]	Hearing to Un-seal- Criminal Plea Transcript	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02368-02373	10/14/2009	[REDACTED]	[REDACTED], [REDACTED]	Igor Zinoviev depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
02376-02392	10/14/2009	[REDACTED]	[REDACTED]	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02401-02410	05/08/2009	[REDACTED]	[REDACTED]	Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02414-02419	05/12/2009	Attorneys at [REDACTED]	[REDACTED]	Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03669-03670	10/08/2009	[REDACTED]	[REDACTED]	Epstein house arrest monitor	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02288-02289	05/26/2009	[REDACTED]	[REDACTED]	Motion date	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02292-02293	05/19/2009	[REDACTED]	[REDACTED]	Pimp and His Game	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02304-02308	09/17/2009	[REDACTED]	[REDACTED]	Forensics/Investigations	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02313-02316	07/01/2009	[REDACTED]	[REDACTED]	Confidential Agreement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
02331-02334	05/08/2009	[REDACTED]	[REDACTED]	Critton order Transcript	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02173	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein Juan Alessi	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02187	07/26/2009	[REDACTED]	[REDACTED]	Epstein matter	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02195-02197	09/17/2009	[REDACTED]	[REDACTED]	Epstein Order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02199-02203	09/18/2009	[REDACTED]	[REDACTED]	Epstein Order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02211-02214	07/01/2009	[REDACTED]	[REDACTED]	Epstein v. State of Florida- Emergency Petition for Writ of Certiorari	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02224	07/28/2009	[REDACTED]	[REDACTED]	Witness of Epstein rapes from Switzerland	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10787-10799	10/19/2009	[REDACTED]	[REDACTED]	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10901-10902	05/11/2009	[REDACTED]	[REDACTED]	RICO Enterprise	Work product; attorney/client privilege;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10904-10905	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10908-10909	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10912-10913	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10955-10963	06/01/2009	[REDACTED]	[REDACTED]	Plaintiff's Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10979-10981	06/03/2009	[REDACTED]	[REDACTED]	Serve Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11022-11025	06/26/2009	[REDACTED]	[REDACTED]	Info on 2 MC2 Workers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11036-11037	07/21/2009	[REDACTED]	[REDACTED]	Serve Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11039-11071	07/21/2009	[REDACTED]	[REDACTED]	Retainer from the Firm	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
11083-11084	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11105-11110	09/09/2009	[REDACTED] [REDACTED]	[REDACTED]	Disseminate letter from Wexner attorney	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11137-11139	10/03/2009	[REDACTED] [REDACTED]	[REDACTED]	Zorro Trust research info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11143-11146	10/04/2009	[REDACTED] [REDACTED]	[REDACTED]	11/28 Discovery Cutoff	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11155-11156	10/18/2009	Attorneys at [REDACTED]	[REDACTED]	New Property	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11175-11183	04/27/2009	[REDACTED]	[REDACTED]	Epstein Case info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11196-11197	05/28/2009	[REDACTED] [REDACTED]	[REDACTED]	Jail Visitors	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11205-11207	05/28/2009	[REDACTED] [REDACTED]	[REDACTED]	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
11359-11362	08/10/2009	[REDACTED] [REDACTED]	[REDACTED]	Epstein depos	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11366-11371	08/11/2009	[REDACTED] [REDACTED]	[REDACTED]	Trump depo info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11377-11379	08/12/2009	[REDACTED] [REDACTED]	[REDACTED]	Issuing Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11390-11395	08/17/2009	[REDACTED] [REDACTED]	[REDACTED]	Witness depos	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11400-11415	08/18/2009	[REDACTED] [REDACTED]	[REDACTED]	Subpoenas for pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11420-11426	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Serving Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11428-11429	08/26/2009	Attorneys at [REDACTED]	[REDACTED]	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11568	10/07/2009	[REDACTED] [REDACTED]	[REDACTED]	Meeting with Leslie Wexner	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11587	10/23/2009	[REDACTED] [REDACTED]	[REDACTED]	Visoski Depo	Work product; attorney/client privilege;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11861-11865	10/23/2009	Attorneys at [REDACTED]	[REDACTED]	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11870-11871	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11874	08/24/2009	[REDACTED]	[REDACTED]	Confidential info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11876	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11967-11972	10/29/2009	[REDACTED]	[REDACTED]	Subpoenas for Epstein's Attorneys	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08072-08075	07/22/2009	[REDACTED]	[REDACTED]	Total counts for [REDACTED]	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08090-08091	10/05/2009	[REDACTED]	[REDACTED]	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08114-08117	08/18/2009	[REDACTED]	[REDACTED]	Updated Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
08157-08159	06/03/2009	[REDACTED]	[REDACTED]	Vanity Fair	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08499-08501	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10063-10068	08/03/2009	[REDACTED]	[REDACTED]	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10090-10091	08/31/2009	Attorneys at [REDACTED]	[REDACTED]	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10103-10104	08/27/2009	Attorneys at [REDACTED]	[REDACTED]	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10106-10137	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Meetings/ Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
12569	07/30/2009	[REDACTED]	[REDACTED]	Epstein Sex Abuse Litigation Forum	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15827-15837	07/22/2009	[REDACTED]	[REDACTED]	Retainer for Investigator	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
15820-15822	10/29/2009	[REDACTED] [REDACTED]	[REDACTED]	Subpoenas for Epstein's Attorneys	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15401-15412	09/09/2009	[REDACTED] [REDACTED]	[REDACTED]	Disseminate the letter from wexner atty	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15356-15359	08/26/2009	Attorneys at [REDACTED]	[REDACTED]	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
14934-14950	07/22/2009	[REDACTED] [REDACTED]	[REDACTED]	Investigator Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
13413-13414	08/06/2009	[REDACTED] [REDACTED]	[REDACTED]	Epstein information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
13908-13911	08/24/2009	Attorneys at [REDACTED]	[REDACTED] [REDACTED]	Meeting info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10595-10597	09/29/2009	[REDACTED]	[REDACTED] [REDACTED]	Subpoena for [REDACTED]	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10621-10624	10/02/2009	[REDACTED]	[REDACTED] [REDACTED]	Meeting with Wexner atty	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
10633-10638	10/05/2009	[REDACTED]	[REDACTED]	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10681-10692	10/07/2009	[REDACTED]	[REDACTED]	Depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10777-10786	10/16/2009	[REDACTED]	[REDACTED]	New Evidence of Epstein Fraudulent Transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04094-04100	04/07/2009	[REDACTED]	[REDACTED]	Draft Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02915	10/03/2009	Attorneys at [REDACTED]	[REDACTED]	Finances	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02971	10/14/2009	[REDACTED]	[REDACTED]	Larry Visoski depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02976	09/09/2009	[REDACTED]	[REDACTED]	Disseminate the letter from wexner	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02995	06/24/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10172-10178	08/12/2009	[REDACTED]	[REDACTED]	Trump Depo	Work product; attorney/client privilege;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10193	08/11/2009	[REDACTED]	[REDACTED] [REDACTED]	Trump Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10255	09/09/2009	[REDACTED]	[REDACTED] [REDACTED]	Depo of Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10259-10263	09/09/2009	Attorneys of [REDACTED]	[REDACTED] [REDACTED]	Cooperfield Service	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03876-03877	10/26/2009	[REDACTED]	[REDACTED] [REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03879-03884	07/13/2009	[REDACTED] [REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03886-03891	07/13/2009	[REDACTED]	[REDACTED] [REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03905-03920	09/08/2009	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED] Doe v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03937	08/17/2009	[REDACTED] [REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
04005-04011	05/13/2009	[REDACTED]	[REDACTED]	Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04070-04093	04/07/2009	[REDACTED]	[REDACTED]	Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03754	07/08/2009	[REDACTED]	[REDACTED]	Conference Call	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03848-03858	09/09/2009	[REDACTED]	[REDACTED]	Cooperfield Service	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03642-03643	09/04/2009	[REDACTED]	[REDACTED]	1. Accounts/ 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03657-03661	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02475	06/15/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02494-02515	09/20/2009	[REDACTED]	[REDACTED]	Mark Epstein Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
02520-02543	06/06/2009	[REDACTED]	[REDACTED]	Memo of Assest Transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02548-02553	08/03/2009	[REDACTED]	[REDACTED]	Federal Subpoena	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02560-02565	07/31/2009	[REDACTED]	[REDACTED]	Federal Subpoena	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02568-02570	10/13/2009	[REDACTED]	[REDACTED]	New Times Article	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02578-02583	05/28/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02619-02622	09/09/2009	[REDACTED]	[REDACTED]	New client Retainer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02633-02646	05/01/2009	[REDACTED]	[REDACTED]	Response to Motion to Consolidate + [REDACTED] strategy Memo for Jay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07959-07964	09/24/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
				Visoski depo	irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07595-07604	05/20/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07616	07/22/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07530-07549	06/11/2009	[REDACTED]	[REDACTED]	Overtime	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07470-07507	07/09/2009	[REDACTED]	[REDACTED]	Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07447-07469	10/13/2009	Attorneys at [REDACTED]	[REDACTED]	New Times Article on epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07444-07446	05/01/2009	[REDACTED]	[REDACTED]	Response to Motion to Consolidate + [REDACTED] Strategy Memo for Jay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07440	10/18/2009	Attorneys at [REDACTED]	[REDACTED]	New Trump Property	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07436	04/11/2009	[REDACTED]	[REDACTED]	New cases	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06800-06803	09/06/2009	[REDACTED]	[REDACTED]	RE: 1. Accountants 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06761-06762	08/19/2009	Attorneys at [REDACTED]	[REDACTED]	IME Rules	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06767-06769	09/10/2009	[REDACTED]	[REDACTED]	[REDACTED]	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06782-06787	04/10/2009	[REDACTED]	[REDACTED]	Confidential Detailed Strategy Memo on Asset Protection Issues	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06744-06747	05/01/2009	[REDACTED]	[REDACTED]	Depo of Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06736-06739	05/01/2009	[REDACTED]	[REDACTED]	Asset Protection Issue	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06709-06710	10/14/2009	[REDACTED]	[REDACTED]	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
05845	07/24/2009	[REDACTED]	[REDACTED]	Plane Tail Numbers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05811	06/09/2009	[REDACTED]	[REDACTED]	Witness Numbers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05813	08/15/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05748-05749	08/11/2009	[REDACTED]	[REDACTED]	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05711	05/11/2009	Attorneys at [REDACTED]	[REDACTED]	Subpoena Clinton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05701-05704	04/20/2009	[REDACTED]	[REDACTED]	Epstein strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05687	08/21/2009	[REDACTED]	[REDACTED]	Alfredo Rodriguez	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05690-05691	05/11/2009	[REDACTED]	[REDACTED]	Motion to Unseal	Work product; attorney/client privilege;

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05680-05682	05/11/2009	[REDACTED]	[REDACTED]	Subpoena Clinton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05676	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Topics for Meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05648	07/23/2009	Attorneys at [REDACTED]	Gary [REDACTED]	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05629	08/03/2009	[REDACTED]	[REDACTED]	Law Enforcement cannot release juvenile reports	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05621-05622	09/18/2009	[REDACTED]	[REDACTED]	Preparing Motion to take an IME of Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05610-05612	04/27/2009	[REDACTED]	[REDACTED]	Request for Copies	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05588-05590	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Travel restrictions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
05575-05576	08/21/2009	[REDACTED]	[REDACTED]	Alfredo Rodriguez	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05582	09/11/2009	[REDACTED]	[REDACTED]	Epstein strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05569-05570	08/17/2009	[REDACTED]	[REDACTED]	Legal Opinion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05556-05558	08/14/2009	Attorneys at [REDACTED]	[REDACTED]	Communication with legal expert	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05537	07/30/2009	[REDACTED]	[REDACTED]	No objections from defense counsel regarding depo for [REDACTED]	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05534	07/24/2009	[REDACTED]	[REDACTED]	Flight logs for Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05518	07/22/2009	Attorneys at [REDACTED]	[REDACTED]	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05512-05513	07/23/2009	[REDACTED]	[REDACTED]	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
05399	10/17/2009	[REDACTED]	[REDACTED]	Proposal for settlement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05399	10/17/2009	[REDACTED]	[REDACTED]	Proposal for settlement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05271-05272	07/22/2009	[REDACTED]	[REDACTED]	Depo Dates to take [REDACTED], and [REDACTED]	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05259-05260	07/22/2009	[REDACTED]	[REDACTED]	Investigator retainer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05238	07/14/2009	[REDACTED]	[REDACTED]	File a request to produce	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05240-05241	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	[REDACTED] order on the Epstein probation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05197-05199	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Michael [REDACTED] info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
05155-05156	04/20/2009	[REDACTED]	[REDACTED]	Set Epstein's depo duces tecum	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05159-05160	05/28/2009	[REDACTED]	[REDACTED]	Right to move to reconsider all rulings	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05149-05150	05/27/2009	[REDACTED]	[REDACTED]	Epstein filed a motion to continue the trial	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05153	08/24/2009	[REDACTED]	[REDACTED]	Epstein traveling	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05146-05147	05/26/2009	[REDACTED]	[REDACTED]	The response to the motion to continue is due 6/8	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05137-05144	05/20/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05133-05136	05/11/2009	[REDACTED]	[REDACTED]	Subpoena Clinton and others on Sid Garcia's witness list	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01749-01751	10/28/2009	[REDACTED]	Phaedra Xanthos	Final affidavit from forensic accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
05054-05065	08/18/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein Potential witnesses	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05049-05053	08/18/2009	[REDACTED]	[REDACTED]	Subpoenas for potential witnesses	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04957-04964	09/04/2009	[REDACTED]	[REDACTED]	Juan Alessi statement and burglary report	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04952-04953	10/28/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein injunction filing – accountant affidavit will be sent	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04955-04956	09/03/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein Invoice	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04916-04920	09/11/2009	[REDACTED]	[REDACTED]	Updates on # of victims, billing amounts, etc.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04899	09/10/2009	[REDACTED]	[REDACTED]	Epstein Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26479-26481	08/19/2009	Attorneys at [REDACTED]	[REDACTED]	Assistance on the Epstein Case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
27155-27159	10/23/2009	Attorneys at [REDACTED]	Steven [REDACTED]	PACER entries	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26604-26605	10/27/2009	Phaedra Xanthos	[REDACTED]	Political Contributions/advertisement for the rental on Little St. James Island	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26570	08/13/2009	[REDACTED]	[REDACTED]	Discussions about Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04954	10/28/2009	Attorneys at [REDACTED]	[REDACTED] [REDACTED]	Creation of another Doe file	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06665-06670	08/12/2009	[REDACTED]	[REDACTED]	Epstein Costs	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06675-06676	08/26/2009	[REDACTED]	[REDACTED]	Personal convo in regards to moving offices	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
06679-06682	08/26/2009	[REDACTED]	[REDACTED]	Personal convo in regards to moving offices	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07590-07594	05/13/2009	[REDACTED]	[REDACTED]	Office information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08451-08453	08/17/2009	[REDACTED]	[REDACTED]	Updated Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08455-08456	06/03/2009	[REDACTED]	[REDACTED]	Vanity Fair	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08466-08479	08/26/2009	Attorneys at [REDACTED]	[REDACTED]	Witness info that we need to use	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01767	07/06/2009	[REDACTED]	[REDACTED]	Info on a guy going to [REDACTED] boyfriends house	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08379	06/06/2009	[REDACTED]	[REDACTED]	Info on Former FHP trooper subcontracted by Riley	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08399	07/23/2009	[REDACTED]	[REDACTED]	Epstein affidavit to the reply memo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
08406	10/30/2009	Attorneys at [REDACTED]	[REDACTED] [REDACTED]	Flying epstein rape survivor to St. Louis to see expert	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05697	08/19/2009	[REDACTED]	[REDACTED] [REDACTED]	Meeting with client	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20330-20334	08/24/2009	[REDACTED]	[REDACTED]	Serving Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20327-20329	10/17/2009	Attorneys at [REDACTED]	[REDACTED] [REDACTED]	Property purchased by Epstein in Palm Beach	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20100-20102	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein's arrival at his building	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20283-20326	10/14/2009	Attorneys at [REDACTED]	[REDACTED] [REDACTED]	Research regarding Mr. Visoski and questions to consider during the depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20092-20099	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein travel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
20085-20091	10/15/2009	[REDACTED]	[REDACTED]	Questions from accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19996-20084	10/14/2009	Attorneys at [REDACTED]	[REDACTED]	Visoski Research and Questions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20217-20218	08/04/2009	[REDACTED]	[REDACTED]	Info on Copperfield	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20213-20216	08/03/2009	Attorneys at [REDACTED]	[REDACTED]	Info on Copperfield	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20211-20212	08/03/2009	[REDACTED]	[REDACTED]	Pilots depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20207-20210	08/10/2009	[REDACTED]	[REDACTED]	List of witness	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20201-20204	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Serving Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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[REDACTED], [REDACTED], [REDACTED], [REDACTED], [REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
20193-20200	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Proof of him being out of FL – Violation of the agreement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19982-19985	09/03/2009	[REDACTED]	[REDACTED]	Dave Rogers depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19988	10/07/2009	[REDACTED]	[REDACTED]	Depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19971-19981	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Serving Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19969-19970	08/18/2009	[REDACTED]	[REDACTED]	Subpoenas for Pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19962-19968	08/03/2009	[REDACTED]	[REDACTED]	Working with the FBI to get some info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20190-20192	08/24/2009	[REDACTED]	[REDACTED]	Personal emails regarding [REDACTED] surgery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20187-20189	08/24/2009	Attorneys at [REDACTED]	[REDACTED]	Epstein travel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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[REDACTED] & [REDACTED]

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
19959-19961	07/24/2009	Attorneys at [REDACTED]	[REDACTED]	Flight logs for Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
00156-00157	07/09/2009	[REDACTED]	[REDACTED]	2255 Problem	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15366-15367	09/04/2009	Attorneys at [REDACTED]	[REDACTED]	Witness info that we need to use	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01003-01005	10/12/2009	[REDACTED]	[REDACTED]	Asset movement by Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01013-01014	10/29/2009	[REDACTED]	[REDACTED]	Subpoenaing Epstein's attorneys for their fees and accompanying documents	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01042	07/22/2009	[REDACTED]	[REDACTED]	New Info that our investigators obtained from current FBI agents	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03133-03134	06/09/2009	[REDACTED]	[REDACTED]	Personal conversation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights