

From: Darren Indyke <[REDACTED]>
To: Lesley Groff <[REDACTED]>
Subject: Fwd: Privileged and Confidential
Date: Tue, 27 Aug 2013 18:51:47 +0000

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Begin forwarded message:

From: Tonja Haddad Coleman <[REDACTED]>
Date: August 27, 2013 2:51:27 PM EDT
To: Darren Indyke <[REDACTED]>, Jeffrey Epstein <jeevacation@gmail.com>
Cc: Jack Goldberger <[REDACTED]>, Fred Haddad <[REDACTED]>
Subject: RE: Privileged and Confidential

1:30 or after is better for me. I have a 12:30 appointment. Here is an agenda for the conference:

1. Motion to Compel re: Deposition Questions
 - a. if we are moving to exclude certain things and/or prevent Edwards from using them I do not want to compel discovery from him on it; and
 - b. Attorney/client privilege argument
2. Trial Exhibit and Witness list from Edwards
3. Do we have an expert? Are we going to call Scherer?
4. Advice of Counsel Defense and Discovery

5. Can we disqualify Scarola (as per Darren and Jeffrey's request).

Tonja Haddad Coleman, Esq.

TONJA HADDAD, P.A.

Advocate Building

315 SE 7th Street

Fort Lauderdale, FL 33301

[Redacted] facsimile

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From: Darren Indyke [mailto:[Redacted]]
Sent: Tuesday, August 27, 2013 2:44 PM
To: Jeffrey Epstein
Cc: Jack Goldberger; Fred Haddad; Tonja Haddad Coleman
Subject: Privileged and Confidential

Does 1PM on Thursday work for everyone? If not please let me know what times work. Thanks.

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On Aug 27, 2013, at 2:16 PM, Jeffrey Epstein wrote:

can we have a call. all hands

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