

From: Darren Indyke <[REDACTED]>
To: Lesley Groff <[REDACTED]>
Subject: Re: Denise Francois
Date: Fri, 21 Oct 2011 17:23:25 +0000

No. Not necessary. Doesn't say anything that I haven't already told him and don't want to add to his email inundation.

Darren K. Indyke
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On Oct 21, 2011, at 1:23 PM, Lesley Groff wrote:

Do you want me to forward this to JE?

Begin forwarded message:

From: Denise Francois <[REDACTED]>
Date: October 21, 2011 1:19:05 PM EDT
To: Lesley Groff <[REDACTED]>
Cc: DKIESQ <[REDACTED]>
Subject: Re: Darren Indyke

Hi Lesley,

This is my first day back in the office since spending the last three days in St Croix and a Supreme Court training session this morning. Both Mark and Maria are off island and I getting caught up with all of my matters.

With respect to Epstein and LSJ, LLC vs. Fancellong Paneling, Inc. I can tell you that Fancellong Paneling has missed the October 15, 2011 deadline for filing its Rule 26(a) Initial Disclosures. If we want Court

intervention to make Fancelli file, then we first have to write to Fancelli and ask them to comply and/or meet and confer as to an agreed upon date when they expect to comply.

I served interrogatories and requests for production of documents on Fancelli on September 30, 2011. Their responses are due on October 31, 2011 and there is a court order that says: "The parties shall complete all written discovery on or before November 1, 2011." We have done what we were supposed to do. Fancelli now has to send us responses to our discovery requests on or before November 1, 2011 (or at least put them in the mail by that date).

Based upon the attached scheduling order I think that Fancelli has also missed the opportunity to serve interrogatories and requests for production on us.

This particular Judge is a real stickler for complying with Court orders so Fancelli is going to have some problems.

Please note that the scheduling order is attached and we are supposed to mediation this matter by December 1, 2011.

Darren asked me so submit a fair proposal on Boyson and I will do so as soon as possible. Denise

Denise M. Francois

HODGE & FRANCOIS | 1340 Taarneberg | St. Thomas, V.I. 00802

Telephone: [REDACTED] | Fax: [REDACTED]

[REDACTED]

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On Wed, Oct 19, 2011 at 9:51 AM, Lesley Groff <[REDACTED]> wrote:

Good morning Denise.

Darren is asking if there is any update on Fancelli regarding Boyson...he says he is getting a lot of push back from Jeffrey...

Please let me know.

Thanks,
Lesley
Assistant to Jeffrey Epstein
[REDACTED]

<Order - scheduling plan 2011-08-02.pdf>

EFTA00425455

