

August 15, 2011

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Blvd.
West Palm Beach, Florida 33409

Re: Edwards adv. Epstein

Dear Mr. Scarola:

As you may know, I was Jeffrey Epstein's attorney when he submitted his guilty plea. Accordingly, "any knowledge" I may have in connection with that plea is privileged information. If you would let me know what non-privileged information you would seek from me, I would then be able to decide whether to cooperate.

Sincerely,

Alan M. Dershowitz

bcc: JE

August 29, 2011

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Blvd.
West Palm Beach, Florida 33409

Re: Edwards adv. Epstein

Dear Mr. Scarola:

I have never personally observed Jeffrey Epstein in the presence of underage females. I do not believe you have any reasonable basis for believing that I have. If you claim to have "reason to believe," please provide me with any such reason. I am certain I can demonstrate to you that it is false.

Sincerely,

Alan M. Dershowitz

From: Alan Dershowitz [REDACTED]
Sent: Monday, January 05, 2015 3:56 PM
To: Jack Scarola
Subject: Fwd: Scarola

Sent from my iPhone

Begin forwarded message:

> From: Carolyn Cohen [REDACTED]
> Date: January 5, 2015 at 3:43:11 PM EST
> To: Alan gmail [REDACTED]
> Subject: Scarola

> Dear Mr. Scarola,

> It is not true that your firm ever previously asked me to be deposed regarding the false charges of sexual assault against me since there were no such charges at the time of the request. I will happily agree to be deposed about these false charges as part of the defamation action I am bringing against Mr. Edwards, Mr. Cassell and Ms. Roberts. I expect that they, too, will agree to be deposed. I am confident that mutual depositions will produce the truth-- namely that Edwards and Cassell unethically filed a false charge against me knowing it was untrue.

> There are no other current legal proceedings to which we are all parties that would justify any depositions.

From: Jack Scarola [JSX@██████████]
Sent: Monday, January 05, 2015 4:59 PM
To: Alan Dershowitz
Subject: Re: Scarola

Dear Mr. Dershowitz:

It will be unproductive to debate by email either past history regarding our efforts to depose you, the merits of your unfiled public relations "defamation action", or your unusual position that you need to be a party to a pending proceeding in order to be deposed. Allow me to simply note that you are wrong on all counts.

If you have, in fact, retained counsel to address issues relating to either Mr. Edwards or Professor Cassell, and assuming you are not intending to appear as co-counsel on your own behalf, then please forward this exchange to your lawyer and direct future communications through him/her.

Sincerely,
Jack Scarola, Esq.

On Jan 5, 2015, at 3:55 PM, "Alan Dershowitz"
<██████████@██████████> wrote:

Sent from my iPhone

Begin forwarded message:

From: Carolyn Cohen <██████████@██████████>
Date: January 5, 2015 at 3:43:11 PM EST
To: Alan gmail <██████████@██████████>
Subject: Scarola

Dear Mr. Scarola,

It is not true that your firm ever previously asked me to be deposed regarding the false charges of sexual assault against me since there were no such charges at the time of the request. I will happily agree to be deposed about these false charges as part of the defamation action I am bringing against Mr. Edwards, Mr. Cassell and Ms. Roberts. I expect that they, too, will agree to be deposed. I am confident that mutual depositions will produce the truth-- namely that Edwards and Cassell unethically filed a false charge against me knowing it was untrue.

There are no other current legal proceedings to which we are all parties that would justify any depositions.

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From: Sarah Neely [redacted] on behalf of Alan Dershowitz
Sent: Tuesday, January 13, 2015 1:31 PM
To: Alan Dershowitz
Subject: FW: Epstein - Deposition of Alan Dershowitz on October 28, 2009

From: Jacquie Johnson [mailto:[redacted]]
Sent: Wednesday, October 21, 2009 11:52 AM
To: Sarah Neely
Subject: Epstein - Deposition of Alan Dershowitz on October 28, 2009

Hi Sara - Mr. Dershowitz has been served with a Subpoena for Deposition for the 28th. We have a number of attorneys travelling from South Florida for the deposition and before I make travel arrangements, can I confirm with you that the depo is confirmed.

Jacquie Johnson
Legal Assistant to
Brad Edwards, Esq.
Partner
Rothstein Rosenfeldt Adler
401 East Las Olas Blvd.
Suite 1650
Fort Lauderdale, FL 33301
Telephone [redacted]
Fax [redacted]
[redacted] <mailto:[redacted]>

From: Sarah Neely [redacted] on behalf of Alan Dershowitz
Sent: Tuesday, January 13, 2015 1:34 PM
To: Alan Dershowitz
Subject: FW: Edwards adv. Epstein: Letter from Jack Scarola, Esq. to Alan Dershowitz, Esq. 9/7/11
Attachments: ATT17050815.gif; ATT17050816.gif; Scanned File.PDF

From: Alan Dershowitz [mailto:[redacted]]
Sent: Wednesday, September 07, 2011 8:52 PM
To: Jeffrey Epstein
Subject: Fw: Edwards adv. Epstein: Letter from Jack Scarola, Esq. to Alan Dershowitz, Esq. 9/7/11

Sent from my Verizon Wireless BlackBerry

From: "Mary E. Pirrotta" <[redacted]mailto:[redacted]>>
Date: Wed, 7 Sep 2011 15:49:15 -0400
To: <[redacted]mailto:[redacted]>
Subject: Edwards adv. Epstein: Letter from Jack Scarola, Esq. to Alan Dershowitz, Esq. 9/7/11

Copitrak Scan Notification

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Spanish

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517 NORTH CALHOUN STREET
TALLAHASSEE, FL 32301-1231
P.O. BOX 1230
TALLAHASSEE, FLORIDA 32302

VIA EMAIL AND U.S. MAIL

September 7, 2011

Alan M. Dershowitz, Esquire
Hauser Hall 520
1575 Massachusetts Avenue
Cambridge, MA 02138

Re: Edwards adv. Epstein
Our File No.: 291874

Dear Mr. Dershowitz:

While we are certainly under no obligation to disclose either the basis for our wanting to depose you or the subject matter of our intended inquiry, we are willing to respond to your request as a matter of professional courtesy.

Multiple individuals have placed you in the presence of Jeffrey Epstein on multiple occasions and in various locations when Jeffrey Epstein was in the company of underage females subsequently identified as victims of Mr. Epstein's criminal molestations. This information is derived from both sworn testimony and private interviews. Your personal observations regarding such circumstances would clearly not involve any privileged communications, and it is those observations that will be the primary focus of our questioning.

Please let us know when and where you will be available.

Sincerely,

Dictated But Not Signed By
Jack Scarola To Expedite Delivery
JACK SCAROLA
JS/mep

cc: Bradley J. Edwards, Esquire

ATTORNEYS AT LAW:
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