

From: "Tonja Haddad Coleman" <[REDACTED]>
To: "Jack Scarola" <[REDACTED]>
Cc: "Mary E. Pirrotta" <[REDACTED]>, "Jack Goldberger" <[REDACTED]>, "Brad Edwards" <[REDACTED]>, "Lilly AnnSanchez" <[REDACTED]>
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)
Date: Wed, 08 Aug 2012 15:49:27 +0000

Mr. Scarola-

First, Paragraph 13 clearly and unequivocally states "[a]ll e-mails, data, correspondence, and similar documents dated **April 1, 2008 through August 1, 2010** . . ." As such, you are neither in a position to change Mr. Epstein's Request for Production nor the Court's Order granting same.

Next, you misplace your reliance on the following statement: "the new log concerns emails, all [sic] which were sent/received subsequent to Bradley Edwards leaving RRA and thus could not be relevant to whether Mr. Edwards "abused process" while at RRA in furtherance of a Ponzi scheme about which he knew nothing." The allegations of "abused process" against Mr. Edwards in this case are not simply premised upon the Ponzi scheme.

Finally, we will wait until the end of the day to file our Motion to Compel and for Sanctions for your failure to abide by the simple instruction from the Court (although we never received a final edit of the submitted Order from you), to afford you the opportunity to comply with *all of* Paragraph 13.

[Tonja Haddad Coleman, Esq.](#)

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From: Jack Scarola [mailto:[REDACTED]]
Sent: Wednesday, August 08, 2012 11:16 AM
To: <[REDACTED]>
Cc: Mary E. Pirrotta; Jack Goldberger; Brad Edwards; Lilly AnnSanchez
Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

Dear Ms. Coleman:

The privilege log we just produced and which was previously filed in connection with the "Paragrah 13 production request" was prepared subsequent to the Order indicating that our earlier log did not comply with TIG. This one does comply.

The new log concerns emails, all which were sent/received subsequent to Bradley Edwards leaving RRA and thus could not be relevant to whether Mr. Edwards "abused process" while at RRA in furtherance of a Ponzi scheme about which he knew nothing.

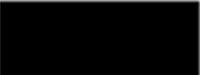
You continue to want to revisit the old log, which the Court has determined did not need to be revisited, but if you want to try yet again, my assistant will accommodate your request to schedule a hearing.

EFTA00641925

On Aug 8, 2012, at 10:12 AM, "Tonja Haddad Coleman" <[REDACTED]> wrote:

Please see attached.

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<Discovery Letter.PDF>

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