

From: "Tonja Haddad Coleman" <[REDACTED]>
To: <[REDACTED]>, "Mary E. Pirrotta" <[REDACTED]>, <[REDACTED]>, <[REDACTED]>, <[REDACTED]>, "Jack Scarola"

Subject: RE: Friday's Hearing
Date: Wed, 01 Aug 2012 15:33:24 +0000

Attachments: Motion to Compel Re Privilege Log.pdf;
[REDACTED](2).pdf

Mr. Scarola-
Because you seemed so certain in your email to my office yesterday that you have no outstanding discovery issues, I reviewed both the Motion to Compel Production of Documents and the Order regarding same that was entered by the Court on May 7, 2012; the one for which you requested clarification. I am attaching copies of each for your review.
It seems very clear in the Order that Mr. Epstein's Motion was granted and that "[t]he Defendant Bradley Edwards shall within 30 days of this Order file a more complete privilege log." The Court further avowed that your privilege log was "insufficient on its face" and in non-compliance with the prevailing case law and applicable Rules of Civil Procedure.
To date, we have not received a "more complete privilege log" as mandated by the court. Accordingly, contrary to your assertion, there are discovery issues outstanding that must be addressed by the court on Friday.

[Tonja Haddad Coleman, Esq.](#)
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From: Tonja Haddad Coleman [mailto:[REDACTED]]
Sent: Tuesday, July 31, 2012 10:43 AM
To: 'Mary E. Pirrotta'; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; 'Jack Scarola'
Cc: [REDACTED]
Subject: Friday's Hearing

Mr. Scarola:
The attached Order has never been addressed by the Court and was the subject of your Motion for Clarification; the hearing on which was continued by the Court until this Friday. Because you have never complied with the attached Order, notwithstanding the Court's explicit and simple instructions therein, the hearing Friday must go forward- unless you want to provide to us the emails between Mr.

Edwards and the members of the press (which are not privileged) and the other emails referenced in the Order.

Please advise. Thank you.

[Tonja Haddad Coleman, Esq.](#)

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From: Mary E. Pirrotta [mailto:[REDACTED]]
Sent: Friday, July 13, 2012 10:30 AM
To: [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]; [REDACTED]
Subject: Regarding: Edwards, Bradley adv. Epstein (File #: 291874) UMC hearings on Monday July 16 are cancelled due to judge's calendar suspension through 7/20

It appears that since the filing of the initial motion set for UMC on 7/16, Judge Crow's UMC calendar has become suspended through 7/20.
We would like to reschedule these motions for Monday, 7/23. Please confirm your availability. Thank you.

Mary Pirrotta
Secretary to Jack Scarola, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.
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