

From: Heather Gray <[REDACTED]>
To: "Jeffrey Epstein (jeevacation@gmail.com)" <jeevacation@gmail.com>
CC: Mari-Claudia Jiménez Esq. ([REDACTED]) <[REDACTED]>
Subject: LITIGATION HOLD NOTICE
Date: Fri, 05 Feb 2016 16:08:23 +0000

Jeffrey,

Please read the below Litigation Hold Notice from our outside litigation counsel at Herrick Feinstein and follow the instructions contained within it regarding the preservation of any emails, text messages, documents, etc. that you may have relating to the Picasso sculpture or the Agreement of Sale with Gagosian Gallery.

Please give me a call if you have any questions. I'm in the office ([REDACTED]).

Best,
Heather

Heather Gray
Elysium Management LLC
445 Park Avenue
Suite 1401
New York, NY 10022
[REDACTED]
[REDACTED]

From: Jimenez, Mari-Claudia [mailto:[REDACTED]]
Sent: Thursday, February 04, 2016 1:41 PM
To: Heather Gray <[REDACTED]>
Cc: Kaye, Lawrence <[REDACTED]>; Hirsch, Ross <[REDACTED]>
Subject: LITIGATION HOLD NOTICE

Dear Heather,

Please circulate the attached litigation hold notice by email to Leon and all parties who may have responsive material. Please cc me when you circulate it or forward the emails once circulated so we have a record that it has been distributed.

Thank you.

Mari-Claudia

LITIGATION HOLD NOTICE

PLEASE READ THE FOLLOWING MESSAGE REGARDING LITIGATION

As you may know, Leon Black has just been named in a lawsuit by Pelham Europe Ltd., in the Southern District of New York, relating to the question of title to Pablo Picasso's sculpture Buste de Femme (Marie Thérèse) or Bust of a Woman (Marie Therese), Boisgeloup, 1931 (the "Sculpture"). The other parties in the lawsuit are Gagosian Galley, Inc., Larry Gagosian, and Diana Widmaier-Picasso.

Until further notice, you may not destroy, delete or alter any documents, data, or other information in your possession, custody and/or control whether it be on paper or stored electronically, containing information about or relating in any way to the Sculpture and/or the "Agreement of Sale," dated as of May 4, 2015, between Gagosian Galley, Inc. and Narrow Holdings LLC/AP Narrows LP.

This obligation to retain documents suspends and supersedes any normal or routine disposal practices or policies. You must continue to preserve the documents until further notice.

For purposes of this instruction, documents, data and other information include, but are not limited to, your emails (sent or received), text messages, paper files, personal files, calendars, spreadsheets (including Excel), telephone messages, drafts and final forms of documents, attorney client communications, communications with third parties, and notes. The term "documents" includes reports, memoranda, charts, graphs, presentations, photographs, stand-alone databases, word processing files, computer presentations (including Power Point), scheduling programs, application programs which process financial, bookkeeping, accounting and billing information, and logs of computer activity, and any hardcopy or electronic data compilation from which information can be obtained such as databases, PDA files, handheld electronic devices, videos, CDs, etc.

Please be reminded that even if you save the document/data electronically, any existing hardcopy must still be preserved. In addition even if you save the document/data in hardcopy, any existing electronic copies must still be preserved.

If you have any questions concerning this memo or a particular document or set of documents please contact me immediately. Thank you for your cooperation with regard to the foregoing.



Mari-Claudia Jiménez
Partner

Herrick, Feinstein LLP

Two Park Avenue | New York, NY 10016

Office

Fax

[website bio](#)

The information in this message may be privileged, intended only for the use of the named recipient. If you received this communication in error, please immediately notify us by return e-mail and delete the original and any copies.