

From: "Tonja Haddad Coleman" <[REDACTED]>
To: "Mary E. Pirrotta" <[REDACTED]>
Cc: "Jack Scarola" <[REDACTED]>, <[REDACTED]>, "Jack Goldberger"
<[REDACTED]>
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)
Date: Thu, 09 Aug 2012 14:07:45 +0000
Attachments: Notice_of_Hearing.PDF

Please see attached.

[Tonja Haddad Coleman, Esq.](#)

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From: Mary E. Pirrotta [mailto:[REDACTED]]
Sent: Thursday, August 09, 2012 10:00 AM
To: [REDACTED]
Cc: Jack Scarola; [REDACTED]
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)

Judge Crow's UMC calendar is suspended 8/13-8/15. That leaves one day open before 8/17 which is 8/16 and Mr. Scarola is available that day.

From: Tonja Haddad Coleman [mailto:[REDACTED]]
Sent: August 09, 2012 9:30 AM
To: Mary E. Pirrotta
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)

The Motion for Summary Judgment is set for next Friday so ideally we need the hearing well before then.

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EFTA00712160

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From: Mary E. Pirrotta [mailto: [REDACTED]]
Sent: Thursday, August 09, 2012 9:31 AM
To: [REDACTED]
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)

Do you want Mr. Scarola's UMC availability over next two weeks?

From: Tonja Haddad Coleman [mailto: [REDACTED]]
Sent: August 09, 2012 9:27 AM
To: Jack Scarola
Cc: Mary E. Pirrotta; 'Jack Goldberger'; 'Brad Edwards'; 'LillyAnnSanchez'
Subject: RE: Edwards, Bradley adv. Epstein (File #: 291874)

I am again requesting dates on which Mr. Scarola is available for hearing on our Motion to Continue the Summary Judgment hearing. Thank you.

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From: Jack Scarola [mailto: [REDACTED]]
Sent: Wednesday, August 08, 2012 12:12 PM
To: < [REDACTED] >
Cc: Mary E. Pirrotta; Jack Goldberger; Brad Edwards; LillyAnnSanchez
Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

I respectfully disagree and welcome the opportunity to watch you again attempt to explain to the Court how this discovery could possibly lead to admissible evidence. Should you choose to continue to attempt to pursue the malicious prosecution of your spurious claims and the irrelevant fishing expedition attendant to that malicious prosecution you will simply be continuing to aggravate your client's (and perhaps your own) liability. The only basis upon which you have thus far evaded the application of the litigation privilege has been the totally unsupported and unsupportable accusation that Brad Edwards knowingly utilized the claims against your child molester client to facilitate the Rothstein Ponzi scheme. Once the scheme was publicly disclosed and Brad Edwards left RRA, there was no possibility that the legitimate claims against Epstein were being employed to advance a scheme that no longer existed.

On Aug 8, 2012, at 11:51 AM, "Tonja Haddad Coleman" < [REDACTED] > wrote:

Mr. Scarola-

EFTA00712161

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.

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From: Jack Scarola [<mailto:>]
Sent: Wednesday, August 08, 2012 11:16 AM
To: < >
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.

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

Please see attached.

Tonja Haddad Coleman, Esq.

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<Discovery Letter.PDF>

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