

From: Martin Weinberg <[REDACTED]>

To: Jeffrey Epstein <jeevacation@gmail.com>, Martin Weinberg <[REDACTED]>

Subject: Re: ATTORNEY-CLIENT PRIVILEGE

Date: Mon, 22 Jul 2013 23:53:49 +0000

i'd have to go back to see whether they were redacted from NPA but yes, odd, to order that a privilege log be publicly filed (disincentivizes the usual requirement of particularizing the documents, claims), but a more benign explanation is that after staying the discovery for so long only to deny the basis for the stay - the govt MTD - J Marra wants to speed the case forward, avoid discovery disputes, avoid redaction and sealing disputes after keeping too much of case under seal etc (but its possible that the aggregate of all the attacks on you has created some unwarranted skepticism over whether the NPA resulted from a fair process - which it did)

Martin G. Weinberg, Esq.

20 Park Plaza, Suite 1000

Boston, MA 02116



=====

This Electronic Message contains

information from the Law Office of

Martin G. Weinberg, P.C.,

and may be privileged. The

information is intended for the

use of the addressee only. If you

are not the addressee, please note

that any disclosure, copying,

distribution, or use of the

contents of this message is

prohibited.

From: Jeffrey Epstein <jeevacation@gmail.com>
To: Martin Weinberg <[REDACTED]>
Sent: Monday, July 22, 2013 6:42 PM
Subject: Re: ATTORNEY-CLIENT PRIVILEGE

dont you think that [REDACTED] is aware and supporting/ seems odd, [REDACTED] name [REDACTED] etc.

On Mon, Jul 22, 2013 at 7:26 PM, Martin Weinberg <[REDACTED]> wrote:

Sorry, forgot (maybe because i've never seen a publicly filed detailed index of GJ materials as having been required by a court in a non-criminal case), fact of draft indictments, etc already embedded in log. We could also refer to pgs, line items in log when particularizing the extent of prejudice if court considers handing over such traditionally secret materials like the name of a 6001 immunity application, etc.

Martin G. Weinberg, Esq.

20 Park Plaza, Suite 1000

Boston, MA 02116



This Electronic Message contains

information from the Law Office of

Martin G. Weinberg, P.C.,

and may be privileged. The

information is intended for the

use of the addressee only. If you

are not the addressee, please note

that any disclosure, copying,

distribution, or use of the

contents of this message is

prohibited.

From: Martin Weinberg <[REDACTED]>

To: Jeffrey Epstein <jeevacation@gmail.com>; royb <[REDACTED]>; Martin Weinberg <[REDACTED]>

Sent: Monday, July 22, 2013 6:03 PM

Subject: ATTORNEY-CLIENT PRIVILEGE

Jeffrey

A rough first draft of a possible intervention motion on 6(e). We will expand it, but I am inclined to redact phrases like "draft indictments" so it is not us that is inserting that info into public pleadings. We need to feature your privacy interests - which will lead, inexorably, to a further Cassell attack saying you have no reputational interest to defend. Whether we pre-emptively try through this motion to put in front of J Marra all the good you've done since this case that would be at risk if this historic (and presumptively private stuff) gets to public is something we should think about (science foundation, grants, philanthropy, years since this case etc). We will be bound by the strict pg limits and timelines Court gave Cassell in his 6-19 Order

Martin G. Weinberg, Esq.

20 Park Plaza, Suite 1000

Boston, MA 02116

[REDACTED]



--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved