October 2, 2009

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      Re: Jeffrey Epstein
        Our File No.: ███
Dear Gentlemen and Ladies:

     By now you have received my earlier e-mail alerting you that the September 24 th deposition of ███. contains a list of the names of the victims whose initials are used in the deposition. I believe someone provided this to the court reporter for her use in substituting initials for names in the written transcript; however, it should not be included in the deposition. That makes it too easy for an inadvertent or careless filing of the document, which would negate the anonymity of those plaintiffs who have filed anonymously.

     I have spoken to Toni at Prose Court Reporting, who told me that you and we were the ones to whom copies of this deposition were sent. Therefore, I request the following:

     That you remove that list of names from every copy of the deposition you have made, destroy it and advise me that you have done so. Toni at Prose Court Reporting has assured me that Prose will replace the DVD's free of charge if they contain any version of the list, but I don't believe that they do. We have al agreed that if videotaped depositions are used at trial, they will be edited to remove the use of the full names of any anonymous victims.

     I would appreciate a letter from each office involved reporting that the above precautions have been taken.

     Thank you for your consideration and cooperation in the above matter.

               Very truly yours,
               Katherine W. Ezell

KWE/mce
cc: Toni
    Prose Court Reporting