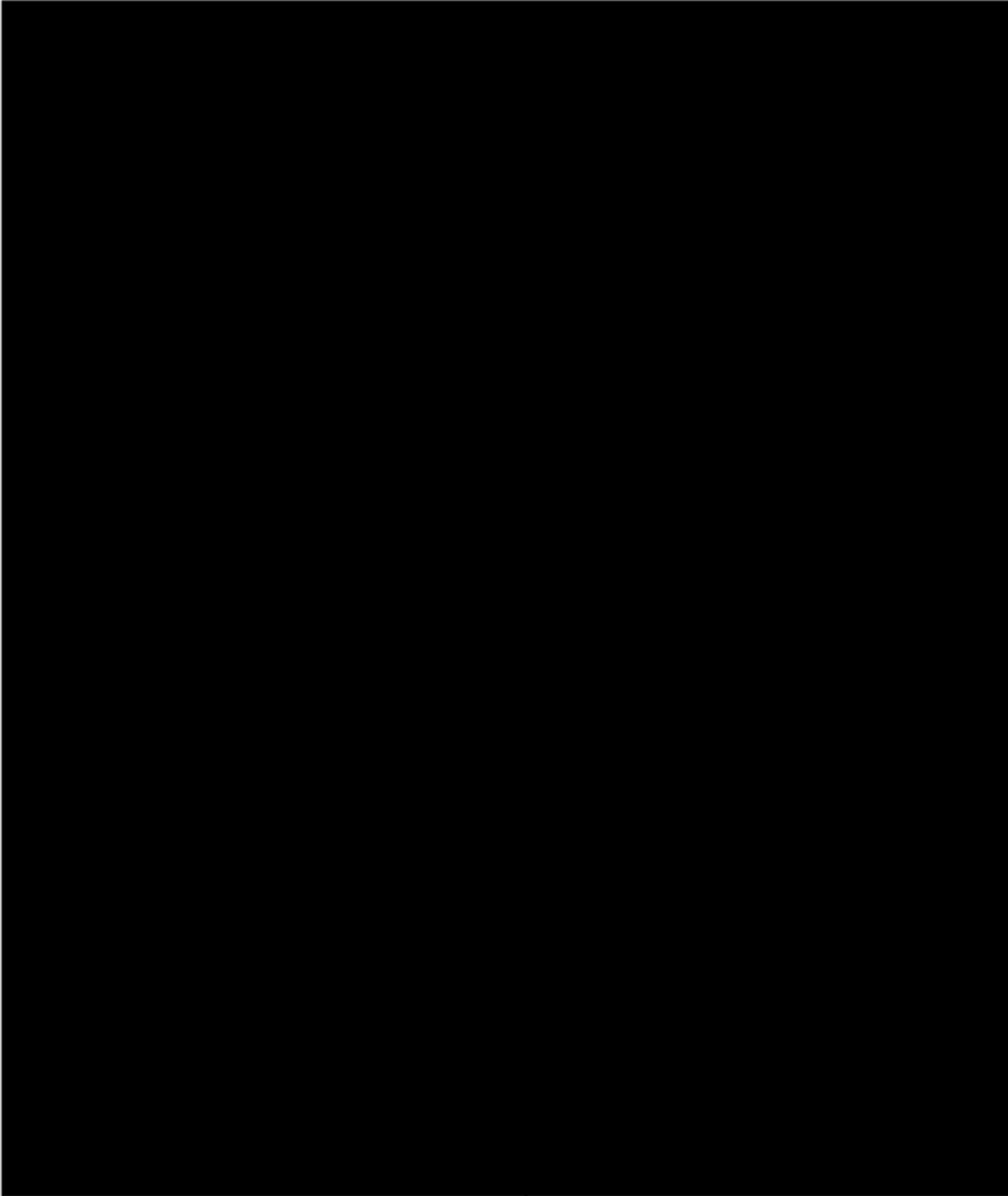


**PRIVILEGED AND CONFIDENTIAL  
ATTORNEY-CLIENT COMMUNICATION**

**MEMORANDUM**

**TO:** Jeffrey Epstein  
**FROM:** Darren K. Indyke  
**DATE:** August 12, 2009  
**RE:** Discovery in Jane Doe No. 2 Case



## **Requests to Produce**

The excerpt from the Court Order requires the defendant to respond to the following Requests to Produce:

(Note: The relevant time period is 1/1/2003 to present, unless otherwise stated)

7. All surveillance videos, slides, film, videotape, digital recording or other audio or video depiction or image of the Palm Beach Residence. Palm Beach residence is defined as the property located in Palm Beach, Florida having an address of 358 El Brillo Way, PB, FL 33480. **I AM UNAWARE OF ANY RESPONSIVE MATERIALS. PLEASE ADVISE.**

23. All documents referring or relating to Jeffrey Epstein's purchase or consumption of prescription medicine. **I AM UNAWARE OF ANY RESPONSIVE MATERIALS. PLEASE ADVISE.**

In addition, the Court gave defendant 15 days to either (1) produce, or (2) provide a supplement to his response brief by making a particularized showing, by in camera submission or otherwise, demonstrating how the Fifth Amendment may validly be asserted, in response to each of the following Requests to Produce:

10. All documents referring to or relating to air travel and aircraft used by Defendant, including, without limitation, flight logs and flight manifests. Defendant is defined as JEE and any agent, representative, employee or person acting or purporting to act on his behalf, and any corporation, partnership or limited liability company in which JEE is an officer, director or has a controlling interest and all subsidiaries and affiliates of such entities.

11. Any and all documents referring to or relating to modeling agencies, including, but not limited to documents relating to or reflecting communications with female models.

18. Any and all documents and photographs placed by Defendant at any time in the period of these requests on a social networking website, including without limitation, Facebook.com and MySpace.com. See definition of Defendant in RTP 10 above.

19. Any and all documents reflecting or consisting of communications between Jeffrey Epstein and MC2 Models or Jean Luc Brunel, relating or referring to females coming into the United States from other countries to pursue a career in modeling, including, but not limited to, letters, notes and emails.

21. Any and all personal calendars or schedules of or for Jeffrey Epstein from January 1, 2003 to the present.

**AS TO RTPS 10, 11, 18, 19 AND 21, WE SHOULD DISCUSS WHAT INFORMATION, IF ANY, IS AVAILABLE, AND WHAT TO PROVIDE TO CRITTON.**