

From: "Martin Weinberg" <[REDACTED]>
To: "Martin Weinberg" <[REDACTED]>, "Jeffrey Epstein" <[REDACTED]>
Subject: Re: ATTORNEY-CLIENT PRIVILEGE
Date: Sat, 20 Feb 2010 20:13:16 +0000

Bob can also inquire whether the "Rule 16" discovery has been received and if so whether it has been received subject to a protective order, formal or informal that can provide protection from civil subpoenas - ordinarily it is the Govt which seeks to protect its criminal discovery from disclosure to 3d parties - this, of course, may not be that case -

----- Original Message -----

From: [Martin Weinberg](#)
To: [Martin Weinberg](#) ; [Jeffrey Epstein](#)
Sent: Saturday, February 20, 2010 3:04 PM
Subject: Re: ATTORNEY-CLIENT PRIVILEGE

Leave it up to Bob to determine whether Alfredo's attys are opposing compulsion motion - I will look into validity of grounds to intervene on Monday

----- Original Message -----

From: [Martin Weinberg](#)
To: [Jeffrey Epstein](#)
Cc: [REDACTED]
Sent: Saturday, February 20, 2010 3:01 PM
Subject: ATTORNEY-CLIENT PRIVILEGE

First thoughts - Alfredo testified in depositions - committed perjury by saying everything he had he gave to Recarey - has not gotten state (or federal) immunity for other crimes - he would therefore have rights to challenge the motion to compel
Assuming he chose not to do that, the issue would be whether you could intervene arguing that according to Alfredo's own federal plea/statements/Govt compliant it is stolen property - check with Bob + we can research ability of plaintiff to seek to compel the thief to produce the stolen goods over the objection of its owner who, absent theft, would have 5th Am act of production privilege protection

----- Original Message -----

From: [Jeffrey Epstein](#)
To: [Martin Weinberg](#)
Sent: Saturday, February 20, 2010 2:52 PM

as usual you raised a good point,, how do we keep Alfredos tele book out of the hands of the plaintiffs attnys. marie wrote in the complaint that it was prepared by employees, ,

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