

From: "Martin Weinberg" <[REDACTED]>
To: "Jeffrey Epstein" <[REDACTED]>
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Subject: ATTORNEY-CLIENT PRIVILEGE
Date: Sat, 20 Feb 2010 20:01:49 +0000

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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