

From: "Martin Weinberg" <[REDACTED]>
To: "Jeffrey Epstein" <jeevacation@gmail.com>
Cc: "[REDACTED]" <[REDACTED]>
Subject: ATTORNEY-CLIENT PRIVILEGE
Date: Wed, 27 May 2009 22:50:03 +0000

If she had any hesitation about getting involved, sending a copy of motion with letter would guarantee it - I understand the purpose but think we don't get enough - The motion was a public filing with copy to attorney rep

Options:

- 1) Lets prepare: someone should be pulling "contract law" research on remedies when one provision (we call it collateral, govt will call it central) to agreement enjoys no common agreement on its terms - should also pull cases where ambiguities resolved against Govt as party with more power and duty - Mike? Rita? Ami?
- 2) Roy could start dialogue with Jeff Sloman regarding civil litigation - will get heated - establishing some point of contact to work out the remaining issues eg investigation, which damage amount, the Roberts issue, etc re-emphasizing your intention to live up to deal as understood by your counsel (eg \$50,000 to Patrick, \$150,000 if Court overrules our legal position) with ultimate goal being to allow civil parties to litigate all issues without interference from USAO in this most unorthodox situation
- 3) Roy and/or Jay could re-engage BJ, restart settlement dialogue, indicate such discussions would not be enhanced if there was any pressure from USAO, lengthen the time line, and maybe resolve some cases or narrow the disputes
- 4) Jay emails Marie - general - he is point of contact - civil litigation evolving - lots of unanticipated issues - etc - "why don't they talk sometime"

I would definitely do 1). Gives us flexibility to be proactive if you are threatened with breach

Options 2-4 are all, to me, with little promise of success but you may assess them differently. #2 depends on facts not known to me eg whether there is any chance of negotiating a middleground with USAO re what our obligations are under NPA from their perspective (arguing they don't want to create windfalls that were not anticipated - or do they?)

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

From: [Jeffrey Epstein](#)
To: [Martin Weinberg](#)
Sent: Wednesday, May 27, 2009 6:32 PM

the mtd was file yesterday... i thought we might sedn marie letter with a copy, Out of n abumndance of caution.. we enclose our motion , if you have any questions please call