

**From:** Jeffrey Epstein <jeevacation@gmail.com>  
**To:** Melanie Spinella <[REDACTED]>  
**Subject:** Fwd: Sales Tax Call  
**Date:** Thu, 19 Sep 2013 15:19:37 +0000  
**Attachments:** DRAFT--Avisory\_Opinion\_Petition.pdf

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please forward this to leon i don't get it

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**From:** Ada Clapp <[REDACTED]>  
**Date:** Thu, Sep 19, 2013 at 11:10 AM  
**Subject:** Re: Sales Tax Call  
**To:** Alan S Halperin <[REDACTED]>  
**Cc:** Jeffrey Epstein <jeevacation@gmail.com>, "Ms. Eileen Alexanderson" <[REDACTED]>, [REDACTED], Richard J Bronstein <[REDACTED]>, [REDACTED], Christopher L Hurtado <[REDACTED]>

Thank you for organizing the call. I have attached a first draft for discussion purposes of a proposed Petition for Advisory Opinion with the following caveats:

My in-house research resources are very limited and accordingly, I am unable to confirm that the cases cited in the attached draft are still "good law" or whether there are more pertinent or recent cases out there. I also do not have access to recent editions of secondary sources such as the Calamari & Perillo, Corbin or Williston hornbooks on contracts or Black's Law Dictionary, each of which likely has a helpful definition of "consideration" that could be incorporated into the Petition. Paul Weiss can perhaps fill these gaps.

Ideally, more time should be spent to develop a stronger argument in support of the conclusion we are seeking in such an important case of first impression. I am hoping we can discuss this on our call later.

Best regards,

**Ada Clapp**

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c/o Apollo Management  
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On Sep 19, 2013, at 8:51 AM, "Alan S Halperin" <[REDACTED]> wrote:

Let's speak today, at 5:15. Let's use the following call in details:

[REDACTED]; from an international location dial [REDACTED].

- Enter the **Conference ID** [REDACTED], then **press #**.

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