

From: Tonja Haddad Coleman <[REDACTED]>
To: Jeffrey Epstein <jeevacation@gmail.com>
Subject: Fwd: Epstein discovery
Date: Wed, 16 May 2012 00:35:29 +0000

Just to keep you in the loop- Scarola filed a one-page Motion for Clarification of the Court's Orders (does not specify which ones) and set it for a hearing on next Monday without conferring with my office. I was simultaneously filing our Motion to Compel and for Sanctions, so upon my receipt of Scarola's Motion I sent this. I have yet to receive a response. I sent Darren a copy of the Motion Scarola filed, but let me know if you want a copy.

Have a good evening.

Tonja Haddad Coleman, Esq.
Sent from my iPad

Begin forwarded message:

From: "Tonja Haddad Coleman" <[REDACTED]>
Date: May 15, 2012 2:25:09 PM EDT
To: <[REDACTED]>, "Jack Scarola" <[REDACTED]>
Cc: "Brad Edwards" <[REDACTED]>, "Lilly Ann Sanchez" <[REDACTED]>
Subject: RE: Epstein discovery
Reply-To: <[REDACTED]>

Mr. Scarola:

It appears that our Motions got crossed in the mail. However, please be advised of the following:

First, you are not permitted to unilaterally set hearing dates without first conferring with my office- a rule with which I am certain you are familiar. I am not available on May 21 and as such you shall cancel the hearing you set without first clearing the date through my office.

Second, the professional courtesy of a telephone call or electronic communication regarding this matter, especially in light of the letter you received from my office last week about the incomplete discovery response, would have been more apposite.

Finally, your Motion is without reference to any applicable Rules, specific Orders from the Court, or specific Discovery requests with which you take issue or about which you are seeking clarification. As such, neither my colleagues nor I could possibly respond to your hollow request in your cover letter to resolve "any of the issues raised in the motion without the necessity of court intervention."

We await your notice of cancellation and strongly caution you against the unilateral setting of hearings in this matter in the future.

Tonja Haddad Coleman, Esq.
Tonja Haddad, P.A.

Justice Building



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