

From: Tonja Haddad Coleman <[REDACTED]>
To: Darren Indyke <[REDACTED]>
Cc: Jeffrey Epstein <jeevacation@gmail.com>
Subject: Re: Edwards adv. Epstein: Please see attached letter from Jack Scarola, Esq. w/attached Supplemental Response to Request to Produce
Date: Fri, 08 Jun 2012 19:56:31 +0000

I am away today so I will defer to you- what do you think? Did he answer all of the questions?

Tonja Haddad Coleman, Esq.
Sent from my iPhone

On Jun 8, 2012, at 3:51 PM, Darren Indyke <[REDACTED]> wrote:

At the end of Scarola's cover letter he asks that upon review of the attached Supplemental Response to the Request to Produce, "please inform us whether you intend to proceed with Monday's hearing."

PLEASE NOTE THAT, EFFECTIVE JUNE 5, 2012, MY NEW CONTACT INFO WILL BE AS FOLLOWS:

DARREN K. INDYKE
DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor,
New York, New York 10022

[REDACTED]
email: [REDACTED]

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On Jun 8, 2012, at 3:26 PM, Tonja Haddad Coleman wrote:

There is still the issue of the sanctions but I am sure we won't get them now. Do they ask me to cancel the hearing on Monday?

Tonja Haddad Coleman, Esq.
Sent from my iPhone

On Jun 8, 2012, at 3:21 PM, Darren Indyke <[REDACTED]> wrote:

So are you saying no hearing on Monday?

PLEASE NOTE THAT, EFFECTIVE JUNE 5, 2012, MY NEW CONTACT INFO WILL BE AS FOLLOWS:

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DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor,
New York, New York 10022

[REDACTED]
email: [REDACTED]

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On Jun 8, 2012, at 3:17 PM, Tonja Haddad Coleman wrote:

I do not- I specifically said in a footnote that we would address the privilege/work product issue at a later time. I am sure we will have to brief the fact that there is not a privilege - much less work product-between a lawyer and a blogger!

Tonja Haddad Coleman, Esq.
Sent from my iPhone

On Jun 8, 2012, at 3:11 PM, Darren Indyke <[REDACTED]> wrote:

In the attached Supplemental Response to the Request to Produce, Edwards's claims that other than what he already delivered and what he included on his privilege log he has no other documents in his possession, custody or control. Tonja, don't you still have to deal at the hearing with Edwards's bogus privilege claims (including work product) relating to [REDACTED] docs and the redactions on the docs he produced - e.g., email from George Rush?

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DARREN K. INDYKE, PLLC
575 Lexington Avenue, 4th Floor,
New York, New York 10022



email: [REDACTED]

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Begin forwarded message:

From: Tonja Haddad Coleman <[REDACTED]>
Date: June 8, 2012 2:26:09 PM EDT
To: Darren Indyke <[REDACTED]>, Debra Fein [REDACTED]
Subject: Fwd: Edwards adv. Epstein: Please see attached letter from Jack Scarola, Esq. w/attached Supplemental Response to Request to Produce

Please see attached. I cannot open it on my phone.

Tonja Haddad Coleman, Esq.
Sent from my iPhone

Begin forwarded message:

From: "Mary E. Pirrotta" [REDACTED]
Date: June 8, 2012 2:19:45 PM EDT
To: "[REDACTED]" <[REDACTED]>
Subject: Edwards adv. Epstein: Please see attached letter from Jack Scarola, Esq. w/attached Supplemental Response to Request to Produce

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