

From: Jeffrey Epstein <jeevacation@gmail.com>

To: [REDACTED]

Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

Date: Wed, 08 Aug 2012 14:56:58 +0000

ok

On Wed, Aug 8, 2012 at 10:53 AM, Tonja Haddad Coleman <[REDACTED]> wrote:

I suggest we have a conference call tomorrow or Thursday to discuss options if you wish, as I need more time to "think it over" as to your question and to check any possible Statute of Limitations issues and I have an emergency hearing at 3PM today that I just found out about (hence the emergency) and I need to focus on that for the next few hours.

Tonja Haddad Coleman, Esq.

TONJA HADDAD, [REDACTED].



The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]

Sent: Wednesday, August 08, 2012 10:20 AM

To: [REDACTED]

Cc: Darren Indyke

Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

If we dismiss, to comply with civil procedure, should we consider re filing a similar but coherent complaint if it does not resolve all issues, or is the statute of limitations a hurdle to overcome

On Wed, Aug 8, 2012 at 7:49 AM, Tonja Haddad Coleman <[REDACTED]> wrote:

Gentlemen:

Below is the letter I would like to send to Scarola this morning. Please let me know your thoughts.

Mr. Scarola:

As you are undoubtedly aware, the attached privilege log is the one that your client was already ordered to revise to comply with *TIG Ins. Corp. v. Johnson*, 799 So. 2d 339 (Fla. 4th DCA 2001) and Rule 1.280 of the *Florida Rules of Civil Procedure*. Clearly this was not done.

Additionally, neither your response nor your privilege log addresses the communications by and between Bradley J. Edwards and Scott W. Rothstein, Marc Nurik, Cara Holmes, Mike Fisten, the U.S. Attorney's Office, the State Attorney's Office, and the Federal Bureau of Investigation. However, your 159 page privilege log, which you asserted in court to Judge Crow was the result of your review of thousands of documents received from the Trustee, irrefutably shows the existence of, and Mr. Edwards' possession of, these documents.

Moreover, how can you assert that an email, the subject of which is "Epstein moving assets and Sex Trafficking," between Mr. Edwards and a member of the press is *irrelevant and privileged*? There is no attorney/reporter privilege, and the subject line irrefutably speaks to the relevance. If you have a case establishing law to the contrary, please feel free to provide it to me.

Finally, you have repeatedly demanded that my client drop this suit, and have threatened me – at *my own personal peril* – for continuing in this case, yet you thwart the discovery process and refuse to hand over the information necessary for us to make an informed decision. The law is clear that communications with the press are *not* protected by litigation privilege and are deemed extrajudicial, which is why, I suspect, Mr. Edwards does not want to turn them over. If Mr. Edwards wants this case to be over, he should be aware that I cannot advise my client as to whether or not dismissal is warranted without reviewing the afore-referenced documents.

As such, please advise as to your availability for a hearing on our Motion to Compel and Motion to Continue the Summary Judgment hearing- both of which you will receive by the end of the day.

Tonja Haddad Coleman, Esq.

TONJA HADDAD, [REDACTED].

Justice Building

524 South Andrews Avenue

Suite 200 North

Fort Lauderdale, Florida 33301

[\(954\) 467-1223](tel:(954)467-1223)

[\(954\) 337-3716](tel:(954)337-3716) facsimile

[REDACTED]

The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

From: Jeffrey Epstein [mailto:jeevacation@gmail.com]
Sent: Tuesday, August 07, 2012 7:52 PM
To: Tonja Haddad Coleman
Cc: Darren Indyke; Jack Goldberger; Roy Black
Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

there are non about govt emails?? ? should we file theses so that they can become public.. should we send some to the editor of the post.? can we go to the bar, I can;t imagine that a lawyer is allowed to use reporters this way,, and then they hide behind privledge

On Tue, Aug 7, 2012 at 2:49 PM, Tonja Haddad Coleman <[REDACTED]> wrote:

Please see attached discovery response as per Friday's hearing. I will review tomorrow when I return to work and we can discuss the response, as well as what we do next.

The TD Bank/Greenberg Traurig Order is quite interesting. Let me know if you need a copy for your reading amusement.

Tonja Haddad Coleman, Esq.

Sent from my iPad

Begin forwarded message:

From: "Mary E. Pirrotta" <[REDACTED]>
Date: August 7, 2012 2:55:48 PM EDT
To: "[REDACTED]" <[REDACTED]>
Subject: Re: Edwards, Bradley adv. Epstein (File #: 291874)

Mary Pirrotta

Secretary to Jack Scarola, Esquire

Searcy Denney Scarola Barnhart & Shipley, [REDACTED]

2139 Palm Beach Lakes Boulevard

West Palm Beach, FL 33409

Phone: [561-686-6300](tel:561-686-6300) Ext. 608

Fax: [561-383-9451](tel:561-383-9451)

Email: [REDACTED]

*** Privileged and Confidential Electronic communication is not a secure mode of communication and may be accessed by unauthorized persons. This communication originates from the law firm of Searcy Denney Scarola Barnhart & Shipley, [REDACTED], and is protected under the Electronic Communication Privacy Act, 18 U.S.C. S2510-2521. The information contained in this E-mail message is privileged and confidential under Fla. R. Jud. Admin. 2.420 and information intended only for the use of the individual(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. Personal messages express views solely of the sender and shall not be attributed to the law firm. If you received this communication in error, please notify the sender immediately by e-mail or by telephone at [\(800\) 780-8607](tel:800-780-8607) and destroy all copies of the original message. Thank you.

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of

Jeffrey Epstein

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved

--

The information contained in this communication is confidential, may be attorney-client privileged, may constitute inside information, and is intended only for the use of the addressee. It is the property of Jeffrey Epstein

Unauthorized use, disclosure or copying of this communication or any part thereof is strictly prohibited and may be unlawful. If you have received this communication in error, please notify us immediately by return e-mail or by e-mail to jeevacation@gmail.com, and destroy this communication and all copies thereof, including all attachments. copyright -all rights reserved