**From:** Mail Delivery Subsystem < ███████████████████████ >
    **To:** jeevacation@gmail.com
**Subject:** Delivery Status Notification (Failure)
    **Date:** Sat, 24 Aug 2013 16:13:12 +0000

---

Delivery to the following recipient failed permanently:

████████████████

Technical details of permanent failure:
The recipient server did not accept our requests to connect. Learn more at
████████████████████████████████████████
[(0) ████████████████ [63.175.28.164]:25: Connection timed out]

----- Original message -----

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;
d=████████; s=20120113;
h=mime-version:in-reply-to:references:date:message-id:subject:from:to
:content-type;
bh=b/IOxZ814ZhgtuRNr9uaM/A4yInZhs3do89dDzVRWJI=;
b=HJ22DlzI0VaPH1G2m314DSFErgcW0iDr5FPkKYmThvuBPrZSayFVR8ze+TqBDZGXQ7
BywK1A+AEdp6cOO5ZYWodBi/U4TbKZALlE5F3Kc0WErFtP1uBZzD9Nm/Q/vDGayuWEre
lLmVEFqH/xU7d/d4MKank+reJ3qd9+4aGP5CCHzS8yUk1l6136MWLJDvgyyKvkiuF5U3
N5Rx1IceUns8MFippkVpeaa9YL+qdlIc2jOLdPj6vRgNWttvfBebhF14Kd3JMOY/Hab0
c5BeUeNTedjEKYw9rdGK/iiJDW2zBf+5GEqEtDoE3HrmV7xSiaBI9I+sFu+lifCSgl0r
b+tw==
MIME-Version: 1.0
X-Received: by 10.66.162.167 with SMTP id yb7mr9878260pab.16.1377092294623;
Wed, 21 Aug 2013 06:38:14 -0700 (PDT)
Received: by 10.68.31.196 with HTTP; Wed, 21 Aug 2013 06:38:14 -0700 (PDT)
In-Reply-To: <DE2418EDD1ED41B78BCC50D7EC880956@martin037a3ae1>
References: <F712EBE036B6A84FAAF82097C45052EB23378A1D@SDSBS-Exch2.US.Searcy.Law>
<2697B05B038B3542BAB0DD8E6CA700CB86C90F@P3PWEX3MB004.ex3.secureserver.net>
< ████████████████████████████ >
<2697B05B038B3542BAB0DD8E6CA700CB86CF3F@P3PWEX3MB004.ex3.secureserver.net>
< ████████████████████████████████ >
<DE2418EDD1ED41B78BCC50D7EC880956@martin037a3ae1>
Date: Wed, 21 Aug 2013 07:38:14 -0600
Message-ID: < ██████████████████████████████████████ >
Subject: Fwd: ATTORNEY-CLIENT PRIVILEGE
From: Jeffrey Epstein <jeevacation@gmail.com>
To: Darren Indyke < ████████████████ >, Jack Goldberger < ████████████████████ >
Content-Type: multipart/alternative; boundary=047d7bacbe700b49cf04e47549ea

Is there a way to get crow to rule prior

---------- Forwarded message ----------
From: *Martin Weinberg*
Date: Wednesday, August 21, 2013
Subject: ATTORNEY-CLIENT PRIVILEGE

To: Jeffrey Epstein <jeevacation@gmail.com>
Cc: ████████████, ████████████

\*\*

My very quick response to the question about waiver of privilege: Step 1 -
Have the Fla lawyers identify the leading cases in Fla state law (from Fla
Sup Ct and District C/Appeals where case is pending) defining the scope of
waiver when a party raises reliance on counsel (a) if a party has multiple
lawyers at the same time does waiver as to one result in waiver as to all,
(b) scope of subject matter waiver - how integrated or overlapping are
other subjects of representation i.e. can the opposing party contend that
the opinion opens door to all related subjects within representation, (c)
discovery - can the opposing party access opinion lawyers file to determine
all information available to lawyer at time of opinion including documents
received from JE, emails from JE, docs and emails from co-counsel so that
waiver for one is de facto waiver for all under circumstances where there
were multiple lawyers (this requires some knowledge of how broadly the
trial judge is interpreting rules of discovery). Reliance on counsel is a
total waiver of all work product and attorney-client that relates to the
subject of the opinion. How much farther it goes is case and fact
specific.

--
\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*\*

----- Message truncated -----