

From: Mail Delivery Subsystem <[REDACTED]>
To: jeevacation@gmail.com
Subject: Delivery Status Notification (Delay)
Date: Thu, 22 Aug 2013 13:57:08 +0000

This is an automatically generated Delivery Status Notification

THIS IS A WARNING MESSAGE ONLY.

YOU DO NOT NEED TO RESEND YOUR MESSAGE.

Delivery to the following recipient has been delayed:

[REDACTED]

Message will be retried for 2 more day(s)

Technical details of temporary failure:

The recipient server did not accept our requests to connect. Learn more at

[REDACTED]
[(0) [REDACTED] [63.175.28.164]:25: Connection timed out]

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

DKIM-Signature: v=1; a=rsa-sha256; c=relaxed/relaxed;

d=[REDACTED]; 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/U4TbKZALIE5F3Kc0WErFtP1uBZzD9Nm/Q/vDGayuWEre
ILmVEFqH/xU7d/d4MKank+reJ3qd9+4aGP5CCHzS8yUk116136MWLJDvgyyKvkiuF5U3
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>

<[REDACTED]>

<2697B05B038B3542BAB0DD8E6CA700CB86CF3F@P3PWEX3MB004.ex3.secureserver.net>

<[REDACTED]>

<DE2418EDD1ED41B78BCC50D7EC880956@martin037a3ae1>

Date: Wed, 21 Aug 2013 07:38:14 -0600

Message-ID: <[REDACTED]>

Subject: Fwd: ATTORNEY-CLIENT PRIVILEGE

From: Jeffrey Epstein <jeevacation@gmail.com>

To: Darren Indyke <[REDACTED]>, Jack Goldberger <[REDACTED]>

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: [REDACTED], [REDACTED]

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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.

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