

**From:** Tonja Haddad Coleman <[REDACTED]>  
**To:** Sigrid McCawley <[REDACTED]>  
**CC:** Jack Scarola <[REDACTED]>, Brad Edwards <[REDACTED]>, Chester Brewer <[REDACTED]>  
<[REDACTED]>  
<[REDACTED]>  
**Subject:** Re: Epstein  
**Date:** Tue, 26 Sep 2017 21:00:59 +0000

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Hello-

Thank you for your response. However, I am not the attorney who will be taking that deposition, and I have been informed that due to your last email, the date no longer works for us. Please either you or Mr. Pottinger provide alternate dates. Thank you.

Tonja Haddad Coleman, Esq.  
Tonja Haddad, PA  
Advocate Building  
315 SE 7th Street  
Suite 301  
Fort Lauderdale, FL 33301

On Sep 26, 2017, at 4:21 PM, Sigrid McCawley <[REDACTED]> wrote:

Hello Tonja,

I understand your position. We can proceed with the deposition as scheduled on October 5, 2017. If it is easier for you to take the deposition in our NY office, we are happy to accommodate.

Thank you,  
Sigrid

**Sigrid McCawley**  
Partner

**BOIES SCHILLER FLEXNER LLP**

401 E. Las Olas Blvd. Suite 1200  
Fort Lauderdale, FL, 33301

(t) [REDACTED]  
(m) [REDACTED]

[www.bsflp.com](http://www.bsflp.com)

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**From:** Tonja Haddad Coleman <[REDACTED]>  
**Sent:** Tuesday, September 26, 2017 2:41 PM  
**To:** Sigrid McCawley; Jack Scarola <[REDACTED]>  
**Cc:** Brad Edwards; Chester Brewer; [REDACTED]

**Subject:** RE: Epstein  
**Importance:** High

Hi Sigrid-

At your request, we have postponed [REDACTED] deposition while you reconsider the specific nature and extent of the confidential treatment, if any, you would be seeking. In that regard, we note that [REDACTED] has been very public about her allegations against Mr. Epstein and others. Moreover, she is Mr. Edwards's client and is identified on his witness list, and her allegations have been featured prominently in Mr. Edwards's pleadings throughout this case, which we assume was with her permission. Use of [REDACTED] deposition testimony, whether in pre-trial motions or at trial, would be unnecessarily complicated by a confidentiality order. As we are a week away from her deposition, which was scheduled over a month ago, we are unable to agree to confidential treatment under the circumstances.

***Tonja Haddad Coleman, Esq.***

**TONJA HADDAD, P.A.**

**Advocate Building**

**315 SE 7<sup>th</sup> Street, Suite 301**

**Fort Lauderdale, FL 33301**

[REDACTED] direct dial

[REDACTED] facsimile

[www.TonjaHaddad.com](http://www.TonjaHaddad.com)

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**From:** Sigrid McCawley [REDACTED]

**Sent:** Tuesday, September 26, 2017 12:46 PM

**To:** Tonja Haddad Coleman <[REDACTED]>; Jack Scarola <[REDACTED]>

**Cc:** Brad Edwards <[REDACTED]>; Chester Brewer <[REDACTED]>

**Subject:** RE: Epstein

Hello Tonja,

Boies Schiller will be representing [REDACTED] as a non-party witness at her deposition in this action. As [REDACTED] testimony may implicate sensitive issues of [REDACTED] we are requesting your agreement that the deposition will be designated as confidential and subject to an agreed protective order confirming its confidential treatment. Please confirm that you are agreeable, because if you are not, then we will need to postpone the deposition to seek a Court order with respect to the confidential nature of the deposition.

Finally, we are happy to host the deposition at our office in Manhattan if that is more convenient for you.

Thank you,  
Sigrid

**Sigrid McCawley**

Partner

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**BOIES SCHILLER FLEXNER LLP**

EFTA01003720

401 E. Las Olas Blvd. Suite 1200  
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**From:** Tonja Haddad Coleman [REDACTED]  
**Sent:** Saturday, September 23, 2017 2:07 PM  
**To:** Jack Scarola  
**Cc:** Brad Edwards; Sigrid McCawley; Chester Brewer  
**Subject:** Re: Epstein

Yes it was I am sorry- we were working on scheduling around one of the three dates you gave us. Mr. Brewers office is preparing the notices

Tonja Haddad Coleman, Esq.  
Tonja Haddad, PA  
Advocate Building  
315 SE 7th Street  
Suite 301  
Fort Lauderdale, FL 33301

On Sep 23, 2017, at 1:42 PM, Jack Scarola <[REDACTED]> wrote:

Tonja-

I assume that my omission from the email copied below was inadvertent, but please be sure I am promptly provided with the NOTICE OF DEPOSITION , which I have not yet received.

Begin forwarded message:

**From:** Tonja Haddad Coleman [REDACTED]  
**Date:** September 18, 2017 at 1:27:14 PM EDT  
**To:** Brad Edwards <[REDACTED]>  
**Cc:** "[REDACTED]"  
**Subject:** [REDACTED] Deposition

Gentlemen-

This will confirm that [REDACTED] deposition will go forward [on October 5, 2017](#) in NYC and that Mr. Epstein will pay for [REDACTED] (and only [REDACTED]) travel expenses. Formal notice to follow. Brad, I also checked my records and I do not believe that [REDACTED] has ever been deposed in any case involving Mr. Epstein. If I am wrong, can you or Mr. Pottinger kindly provide me with a copy of same, or at least the style of the case to which you are referring so that we may include a "Schedule A" to her deposition notice requesting copies of same? Thank you both for your cooperation in this matter.

*Tonja Haddad Coleman, Esq.*  
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