

COMPOSITE
EXHIBIT 3

Sigrid McCawley

From: Sigrid McCawley
Sent: Monday, March 07, 2016 2:22 PM
To: marty@[REDACTED]
Subject: [REDACTED] v. Maxwell
Attachments: 2015-09-21 [DE 1] Complaint.pdf

Hello Marty,

I understand that you are one of the lawyer who represent Jeffrey Epstein. My firm is representing [REDACTED] in her defamation action against Ghislaine Maxwell pending in federal court in New York – case number 15-cv-07433-RWS. (If I am incorrect in my understanding that you represent Jeffrey Epstein kindly let me know.)

We would like to take the deposition of Jeffrey Epstein and want to confirm whether you will be willing to accept service of a subpoena on his behalf. Kindly let me know and we can discuss a date for the deposition.

If you have any questions, I can be reached at [REDACTED]. I have included a copy of the complaint for your review.

Thank you,
Sigrid

Sigrid S. McCawley
Partner
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
<http://www.bsflp.com>

Sigrid McCawley

From: Martin Weinberg [REDACTED]
Sent: Wednesday, April 06, 2016 11:46 AM
To: Sigrid McCawley; Martin Weinberg
Subject: Re: [REDACTED] v. Maxwell

Sigrid, understood. Subject to reserving my rights to make any, all objections, I will let you know on facilitating service and discussing time and place no later than midday tomorrow (in court most of today). Let me know if that works. Marty

Martin G. Weinberg, Esq.
20 Park Plaza
Suite 1000
Boston, MA 02116

-----This Electronic Message contains information from the Law Office of Martin G. Weinberg, P.C., and may be privileged. The information is intended for the use of the addressee only. If you are not the addressee, please note that any disclosure, copying, distribution, or use of the contents of this message is prohibited.

On Wednesday, April 6, 2016 11:39 AM, Sigrid McCawley [REDACTED]

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Thank you,
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Partner
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone [REDACTED]
Fax [REDACTED]
<http://www.bsflp.com/>

From: Sigrid McCawley
Sent: Tuesday, March 08, 2016 1:13 PM
To: 'Martin Weinberg'
Subject: RE: [REDACTED] v. Maxwell

Hello Marty – thank you for your call back this afternoon. I understand from our conversation that you have a “preliminary question” before you can answer whether or not you are authorized to accept service of a subpoena for Jeffrey Epstein’s testimony in the Maxwell action.

You explained that it would be Epstein's position that he would be invoking his Fifth Amendment privilege as to all questions relating to the Maxwell action so your "preliminary question" as I understand it, is whether the plaintiff would be willing to accept a form of sworn statement in response to questions whereby Epstein invokes his Fifth Amendment privilege in lieu of Epstein having to sit for a formal in-person deposition.

I will endeavor to get you a response shortly. Thank you for your call.

Sigrid

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Partner
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
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Phone: [REDACTED]
Fax: [REDACTED]
<http://www.bsfllp.com/>

From: Sigrid McCawley
Sent: Monday, March 07, 2016 3:21 PM
To: 'Martin Weinberg'
Subject: RE: [REDACTED] v. Maxwell

That would be fine. Thank you.

Sigrid S. McCawley
Partner
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
<http://www.bsfllp.com/>

From: Martin Weinberg [REDACTED]
Sent: Monday, March 07, 2016 2:59 PM
To: Sigrid McCawley
Cc: Martin Weinberg
Subject: Re: [REDACTED] v. Maxwell

Hi Sigrid

Give me a few days to check. I represent him on certain matters, not others but will get back to you no later than thursday on the service issue. Let me know if that works for you

Thanks

Marty

Sent from my iPhone

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If you have any questions, I can be reached at (954) 356-0011. I have included a copy of the complaint for your review.

Thank you,
Sigrid

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401 East Las Olas Blvd., Suite 1200
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Sigrid McCawley

From: Martin Weinberg [REDACTED]
Sent: Thursday, April 07, 2016 11:42 AM
To: Sigrid McCawley
Cc: Martin Weinberg
Subject: Re: [REDACTED] v. Maxwell

Sigrid
Do you need an answer today?
I have several time sensitive conflicts and then afternoon court commitments

Sent from my iPhone

On Apr 6, 2016, at 11:46 AM, Sigrid McCawley [REDACTED] wrote:

That works fine – thank you.

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Partner
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Sigrid McCawley

From: Martin G. Weinberg [REDACTED]
Sent: Thursday, April 07, 2016 5:14 PM
To: Sigrid McCawley
Subject: Re: [REDACTED] v. Maxwell

Thanks

From: [Sigrid McCawley](#)
Sent: Thursday, April 07, 2016 12:01 PM
To: [Martin Weinberg](#)
Subject: RE: [REDACTED] v. Maxwell

No – I can wait until tomorrow. Thank you for following up.
Sigrid

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[REDACTED] - Office
[REDACTED] - Cell

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Sigrid McCawley

From: Martin G. Weinberg [REDACTED]
Sent: Friday, April 08, 2016 4:31 PM
To: Sigrid McCawley; owlmgw@att.net
Subject: [REDACTED] v Maxwell

Sigrid, Friday is winding down and due largely to my client's travel/business schedule I have not, today, received final authority to accept service or discuss related arrangements. I will have contact with him over the weekend and get you an answer Monday (or we can default to a "no" if for any reason I don't have an unconditional communication on the service issue by then) if that works. Marty

Martin G Weinberg PC
20 Park Plaza
Suite 1000
Boston, MA 02116
Tel [REDACTED]
Cel [REDACTED]

Sigrid McCawley

From: Sigrid McCawley
Sent: Wednesday, May 25, 2016 10:30 AM
To: [REDACTED]
Cc: Sigrid McCawley; [REDACTED]; Meredith Schultz
Subject: Subject: Re: Service on Jeffrey Epstein
Attachments: Re: [REDACTED] v. Maxwell; Re: [REDACTED] v. Maxwell; Re: [REDACTED] v. Maxwell; Re: [REDACTED] v. Maxwell; [REDACTED] v Maxwell

Hello Marty,

Thank you for the response. I went back through my e-mail communications and I didn't see anything about an agreement by you to accept service of Jeffrey Epstein's deposition for a deposition in the Virgin Islands near his residence. I have attached the e-mails that I have from you above. I do not have an "April 11th" e-mail as referenced below.

That said, we can work to accommodate that location request for a deposition in the Virgin Islands. If Mr. Epstein can accommodate us on his island, assuming he can provide transportation as I understand it is remote, we would be willing to take the deposition at that location. Please confirm given the agreement on relocating the deposition to the Virgin Islands that you will agree to accept service of the subpoena for Jeffrey Epstein's deposition.

Thank you,
Sigrid

Sigrid S. McCawley
Partner
BOIES, SCHILLER & FLEXNER LLP
401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
<http://www.bsflp.com>

From: Martin G. Weinberg; [REDACTED]
Sent: Wednesday, May 25, 2016 8:33 AM
To: Sigrid McCawley; [REDACTED]
Subject: Re: Service on Jeffrey Epstein

Sigrid, first to "correct the record" – I did not simply refuse to accept service in response to your April 6 email, instead, on April 11 I emailed you saying that if you agreed to the deposition being near Mr Epstein's Virgin Island residence, I could accept service subject to our agreeing on a date and my reserving legal objections to the deposition request. I received no answer to that email. As to Monday's email, I would first request that you inform me whether you are agreeable to a deposition in the Virgin Islands (the predicate for my April 11 email and Mr Epstein's sole residential and business venue as defined by Rule 45) in which case I will determine immediately whether I am still authorized to accept service (particularly given the new {to me} and expansive request for documents that like the anticipated testimony would be subject to a principled Fifth Amendment assertion). I remain of the view that Mr. Epstein (indisputably I would contend) has a Fifth Amendment right and intends to assert it in relation to any and all questions and document requests relevant to the subject matter of your case. Thanks. Marty

From: Sigrid McCawley
Sent: Monday, May 23, 2016 9:30 AM
To: [REDACTED]
Cc: Meredith Schultz
Subject: Service on Jeffrey Epstein

Hello Marty,

As you are aware we initially reached out to you back on March 7, 2016 to inquire as to whether you would accept service on your client, Jeffrey Epstein's behalf. You did not agree to accept service so we proceeded with numerous service attempts on Jeffrey Epstein. I am attaching above the latest subpoena that we have been attempting service of. Please confirm whether you will accept service of this subpoena on behalf of Jeffrey Epstein or whether we will be required to seek court intervention for alternative service. As I mentioned previously, if you accept service, we can work with you and your client on a the date and location of the deposition to make it convenient for the parties.

Thank you,
Sigrid

Sigrid S. McCawley
Partner
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