

1 not there are missing logs, have you --

2 A. That's not been something I've focused on.
3 I was only looking at whether or not, within the
4 timeframe, who was with who on what flights, and I
5 saw that [REDACTED] was on some flights with
6 other prominent academics, but never on a flight
7 with me.

8 **Q. Do you know who [REDACTED] was lent
9 out to for sex by Jeffrey Epstein?**

10 MR. INDYKE: Objection based upon
11 attorney-client privilege, work product.

12 A. No, I can tell you outside of the
13 privileged information. I can tell you outside of the
14 privilege. I can tell you outside of the
15 privilege that she has claimed to have had sex on
16 numerous occasions with Leslie Wexner, and was told
17 by -- by Sigrid McCawley that --

18 MS. McCAWLEY: I'm going to object to the
19 line of questioning.

20 MR. SCOTT: Time out.

21 A. That is from a statement made to me --

22 MS. McCAWLEY: No, I just want to be clear
23 because if we're going to violate the privilege
24 again, the order of seal.

25 A. We are not.

1 BY MR. EDWARDS:

2 **Q. I just want the names of the individuals.**

3 A. I can't just give you that. I can tell
4 you that --

5 **Q. That's what I'm asking for.**

6 SPECIAL MASTER POZZUOLI: Hang on one
7 second. The question is: Do you know who
8 [REDACTED] was lent out to for sex by
9 Jeffrey Epstein?

10 MR. EDWARDS: Right. The names of the
11 individuals is all I'm looking for.

12 SPECIAL MASTER POZZUOLI: There's an
13 objection. Okay. Go ahead.

14 A. I was told by John Zeiger, who was Leslie
15 Wexner's lawyer, that Sigrid McCawley claims that
16 her client, [REDACTED], alleges that she had
17 sex with Leslie Wexner on numerous occasions,
18 including one -- and she said this, according to
19 Mr. Zeiger, very aggressively --

20 MS. McCAWLEY: This is revealing
21 confidential settlement discussions.

22 A. Between who?

23 MS. McCAWLEY: Between -- I'm not going to
24 reveal what confidential settlement discussions
25 because that breaches a privilege.

1 MS. McCAWLEY: I'm going to stop that
2 right now because the only conversations I've
3 had with you are in the context of settlement
4 discussion in this case.

5 A. It was not a conversation with Sigrid
6 McCawley. And please let me answer the question. I
7 had a conversation --

8 BY MR. EDWARDS:

9 **Q. Just so we know what the question is, my
10 question is --**

11 A. The question is do I know whether she had
12 sex --

13 **Q. No, it's not.**

14 MR. SCOTT: Let's just ask the question.

15 SPECIAL MASTER POZZUOLI: Hang on. And,
16 court reporter, please reread the question so
17 we understand.

18 COURT REPORTER: "Do you know who [REDACTED]
19 [REDACTED] was lent out to for sex by Jeffrey
20 Epstein?"

21 A. And the answer --

22 MR. SIMPSON: Darren had an objection for
23 you.

24 A. Okay. I understand the instruction, and I
25 can answer the question.

1 So what I'm going to say is that we are
2 not entitled here to be revealing any
3 settlement discussions that have happened on
4 behalf of my client. I'm not going to allow
5 there to be testimony as to that. To the
6 extent this involves Mr. Wexner's attorneys,
7 they are not present at this deposition at this
8 moment who you are mentioning, John Zeiger,
9 who's not able to object to this line of
10 questioning. You've had your client Jeffrey
11 Epstein's lawyers on the phone the entire time,
12 he should be entitled to a right to object to
13 this before there's a revelation of any
14 settlement discussions.

15 MR. SCAROLA: I want to know for the
16 record that Mr. Dershowitz has chosen to
17 disregard the instruction that came from
18 Mr. Epstein's counsel. And that --

19 A. No, I haven't. I have said this comes
20 outside the privilege.

21 SPECIAL MASTER POZZUOLI: Stop. Let him
22 put his -- on the record. Go ahead.

23 MR. SCAROLA: Which is inconsistent with
24 the position that Mr. Dershowitz's counsel says
25 they were taking, and that is that they were