

From: "Ruzumna, Daniel (x2034)" <[REDACTED]>
To: " [REDACTED]" <[REDACTED]>
Cc: "Weiner, Daniel H." <[REDACTED]>, "Weinstein, Marc A." <[REDACTED]>, "McDonnell, Hilary" <[REDACTED]>, "Norris, Tara (x2847)" <[REDACTED]>, "Lau, Sean (x2742)" <[REDACTED]>
Subject: [EXTERNAL EMAIL] - Epstein Estate
Date: Wed, 19 Apr 2023 19:21:55 +0000

Importance: Normal

Attachments: 22cv10904_Doc_112_Order_Re_Estate's_Review_of_Videomaterials_re_CSAM.pdf

Dear Special Agent [REDACTED],

As you have apparently heard from AUSA [REDACTED] [REDACTED], we represent one of the two co-executors of the Estate of Jeffrey Epstein. Hughes Hubbard & Reed represents the other. Recently, we have been responding to requests/demands for documents in connection with a settlement that the Estate entered into with the Government of the U.S. Virgin Islands and in response to subpoenas issued in litigations pending before the U.S. District Court for the Southern District of New York. The Estate is not a party to the SDNY litigation.

As part of the Estate's document production obligations, we are reviewing approximately 1,100 videos that were pulled from Epstein's emails and other files. Because of the potential existence of child pornography in those videos, we worked out a protocol with the parties to whom we owed document production obligations, and that protocol gave our reviewers protection and comfort in undertaking the review. The protocol was submitted to the SDNY Court (Judge Jed Rakoff), who signed the "Order regarding Review of Videomaterials." (Attached).

During the review yesterday, our co-counsel at Hughes Hubbard came across a video that may contain child pornography. Apparently the relevant video was shared with Epstein by an individual who was convicted of a child pornography-type offense and it depicted one or two topless women. In an abundance of caution, we halted the review and reached out to [REDACTED]. Co-counsel at Hughes Hubbard (Dan Weiner and Hilary McDonnell) can correct any misstatements in my description of the review since I heard the account secondhand.

We would appreciate any guidance that you may have. We have been careful not to download videos to the respective law firms' servers, but the videos were processed (without review) by a document collection vendor.

Thanks and we look forward to hearing from you.

Best,
Daniel Ruzumna
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