

From: Jack Scarola <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript
Date: Mon, 14 Sep 2020 18:35:38 +0000

I am unaware of any protective order relating to the [REDACTED] case.

On Sep 14, 2020, at 12:10 PM, [REDACTED] <[REDACTED]> wrote:

Jack,

Are you able to tell us whether there was a protective order entered in the civil suit, or any other type of agreement that would govern disclosing materials from the civil case with us? When you shared the deposition, we assumed there were no such restrictions, but I wanted to check.

Thanks,

[REDACTED]

From: Jack Scarola <[REDACTED]>
Sent: Thursday, September 10, 2020 3:46 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript

Please let me know if you are able to locate the transcript.

On Sep 10, 2020, at 11:30 AM, [REDACTED] <[REDACTED]> wrote:

Jack,

Thanks for your email. We will likely reach out to your adversary in the deposition to ask for a copy, but I wanted to check to see whether you had already done so.

Thanks,

[REDACTED]

From: Jack Scarola <[REDACTED]>
Sent: Wednesday, September 9, 2020 9:53 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Fwd: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript

The email exchange below confirms our inability to locate the first volume of [REDACTED] deposition. However, attached are fairly detailed notes of Paralegal/Investigator Mike Danchuk, who attended the deposition and recorded these notes

contemporaneously. [REDACTED] appears to have held nothing back, and the notes certainly paint a picture of the kind of troubled young women who were particularly susceptible to Epstein's pattern of recruitment, grooming and victimization.

Sent from my iPad

Begin forwarded message:

From: "Chris R. Rodgers" <[REDACTED]>
Date: September 8, 2020 at 3:30:51 PM EDT
To: Jack Scarola <[REDACTED]>
Cc: Mary McCann <[REDACTED]>, "Wendy P. Calvet" <[REDACTED]>, cmasepsteinetalz6385257@projects.filevine.com <cmasepsteinetalz6385257@projects.filevine.com>
Subject: FW: 12/04/09 [REDACTED] . vs Epstein Deposition Transcript

Jack, below is the "Unable to locate" response from Prose Court Reporting. Visual Evidence, the videography service used, also confirmed on Friday that a copy of the video is no longer available. I have attached Mike Danchuk's notes from that deposition.

From: toni proseflorida.com <[REDACTED]>
Sent: September 7, 2020 7:03 AM
To: Chris R. Rodgers <[REDACTED]>
Subject: RE: 12/04/09 [REDACTED] . vs Epstein Deposition Transcript

Chris,

I have searched our records and archives and I am unable to locate Volume I of this deposition from 2009.

Sincerely,
Toni

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