

**From:** [REDACTED]  
[REDACTED] >  
**Cc:** [REDACTED] "[REDACTED]" >  
[REDACTED] "[REDACTED]" >  
**Subject:** Re: Submission on behalf of [REDACTED]  
**Date:** Tue, 17 Mar 2020 19:44:19 +0000

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[REDACTED],

I am working on the new draft of this submission but it is going slower than I expected. [REDACTED] has been in an emotionally and psychologically fragile state, and because of the Coronavirus, we cannot get her the proper therapy which she needs. We have suggested she go back to Florida, so at least she can be in her home and not shut up in a stranger's apartment here in NYC. Additionally, we attorneys have all shut our offices and are working at home, leading to a great loss in productivity.

So, realistically I am hoping to get you the new draft tomorrow afternoon.

[REDACTED]

Sent from my iPhone

On Mar 12, 2020, at 8:49 PM, [REDACTED] > wrote:

Confirming receipt, thanks.

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**From:** [REDACTED]@gmail.com>  
**Sent:** Thursday, March 12, 2020 20:40  
**To:** [REDACTED] >  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Submission on behalf of [REDACTED]

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[Submission on behalf of \[REDACTED\]](#)

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Attached is a draft of the factual statement, just so that you can better understand the facts that we are presenting.

We feel that given [REDACTED] abuse, and given the fact that we see her basically as a cog in Epstein's wheel, acting entirely at his direction and doing what she did at a time that she herself was a very vulnerable victim, a non-pros would be the appropriate disposition. But we want to discuss this with you before we finalize this and make a submission.

Thanks, [REDACTED]

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