

From: [REDACTED]

To: [REDACTED]

Subject: FW: SDNY investigation

Date: Wed, 30 Sep 2020 20:14:04 +0000

Attachments: [REDACTED] (CMA) - Vol. I - 12-04-09.pdf; [REDACTED] - Vol. II.pdf

Team,

Attached are the transcripts of [REDACTED] depositions. I'd like to schedule a team call for Friday to discuss them. Does 10 a.m. Friday work for everyone for a call to discuss? If you need more time to review them, let me know and we can push to Monday.

Thanks,

From: Weinstein, Marc A. [REDACTED]

Sent: Wednesday, September 30, 2020 1:52 PM

To: [REDACTED]

Cc: Andrew Tomback [REDACTED]

Subject: RE: SDNY investigation

The transcripts are attached. We trust that the US Attorney's Office will keep these confidential other than to the extent disclosure is required in any pending case.

Regards,
Marc

Marc A. Weinstein | Partner

Chair, White Collar Defense

Hughes Hubbard & Reed LLP

[REDACTED]

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From: Weinstein, Marc A.

Sent: Wednesday, September 30, 2020 12:03 PM

To: [REDACTED]

Cc: Andrew Tomback [REDACTED]

EFTA00020870

[REDACTED]
Subject: RE: SDNY investigation

[REDACTED] connected with Jack Scarola last week. I just sent him an email to confirm that we can provide you with the transcript. Once we receive confirmation from him, we will send you the transcript.

Best regards,
Marc

From: [REDACTED]
Sent: Tuesday, September 29, 2020 3:40 PM
To: Weinstein, Marc A [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]

Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

Hi Marc,

Hope you're doing well. I wanted to check in on the status of this issue – have you been able to connect with Mr. Scarola?

Thanks,

[REDACTED]

From: Weinstein, Marc A [REDACTED]
Sent: Tuesday, September 22, 2020 4:54 PM
To: [REDACTED]
Cc: Andrew Tomback [REDACTED]
[REDACTED]

Subject: RE: SDNY investigation

Thanks [REDACTED] I will give him a call.

Marc A. Weinstein | Partner
Chair, White Collar Defense

Hughes Hubbard & Reed LLP
[REDACTED]

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From: [REDACTED]
Sent: Tuesday, September 22, 2020 4:42 PM
To: Weinstein, Marc A [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]

EFTA00020871

[REDACTED]
Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

Marc,

Thanks for following up on this. If it's okay with you, I think it makes sense to connect you with the plaintiff's attorney, Jack Scarola, so that he can convey this to you directly. I have spoken with him and explained the context here, and he has told me that he would be happy to speak with you. He is also seeking a copy of the transcript, as he has informed me that he no longer has his case files for matters this old. Here is his contact information:

Jack Scarola
[REDACTED]

Thank you,
[REDACTED]

From: Weinstein, Marc A. [REDACTED]
Sent: Tuesday, September 22, 2020 11:24 AM
To: [REDACTED]
Cc: Andrew Tomback [REDACTED]
[REDACTED]

Subject: RE: SDNY investigation

[REDACTED]
We haven't found a governing protective order, but to be safe, would you be able to get a letter or email from [REDACTED] attorney stating that they are not aware of a protective order/agreement governing the disclosure of the transcript, and to the extent one existed, they are waiving any provisions in order to permit the Estate to provide the transcript to the US Attorney's Office, and that they will not claim, in any forum, that the Co-Executors, the Estate, or any representatives of either, breached any such order/agreement in that case by providing the transcript to the US Attorney's Office.

Let us know if that works on your end.

Best regards,
Marc

Marc A. Weinstein | Partner
Chair, White Collar Defense

Hughes Hubbard & Reed LLP
[REDACTED]

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EFTA00020872

From: [REDACTED]
Sent: Monday, September 14, 2020 3:01 PM
To: Weinstein, Marc A. [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]

Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

Hi Marc,

Thanks – we have conferred with plaintiff's counsel, who has informed us that he is unaware of any protective order relating to the [REDACTED] lawsuit.

Best,

[REDACTED]
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
[REDACTED]

From: Weinstein, Marc A. <[REDACTED]>
Sent: Monday, September 14, 2020 12:07 PM
To: [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]

Subject: Re: SDNY investigation

[REDACTED] we are still looking to see what confidentiality restrictions might apply. If her lawyer has any such confidentiality or protective order that governed the case, it might be helpful if you could obtain and share that.

Marc A. Weinstein | Partner
Chair, White Collar Defense
Hughes Hubbard & Reed LLP
[REDACTED]

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On Sep 14, 2020, at 11:56 AM, [REDACTED] wrote:

CAUTION: This email was sent by someone outside of the Firm.

Marc,

EFTA00020873

Thanks very much. Are you able to provide it to us? If there are any issues with providing it to us, or if a call would be useful to discuss, please let us know.

Thanks,

[REDACTED]

From: Weinstein, Marc A. <[REDACTED]>
Sent: Monday, September 14, 2020 11:51 AM
To: [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]
Subject: RE: SDNY investigation

[REDACTED], we have the transcript of [REDACTED] deposition.

Regards,
Marc

Marc A. Weinstein | Partner
Chair, White Collar Defense

Hughes Hubbard & Reed LLP
[REDACTED]

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From: [REDACTED]
Sent: Friday, September 11, 2020 1:40 PM
To: Weinstein, Marc A. <[REDACTED]>
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]
Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

Thanks, Marc. We'll look forward to hearing from you, and thanks for your assistance with this.

From: Weinstein, Marc A. <[REDACTED]>
Sent: Friday, September 11, 2020 1:35 PM
To: [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]
Subject: RE: SDNY investigation

Thanks [REDACTED]. It wasn't clear to me from the call that it was the plaintiff's deposition that you were after, as opposed to another witness in the case. Now that it's clear, we will see if we can track it down.

Regards,

EFTA00020874

Marc

Marc A. Weinstein | Partner
Chair, White Collar Defense

Hughes Hubbard & Reed LLP

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From: [REDACTED]
Sent: Friday, September 11, 2020 1:30 PM
To: Weinstein, Marc A. [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]
Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

Marc,

Thanks for speaking earlier. The plaintiff's name is [REDACTED] who is represented by Jack Scarola. The deposition took place in 2009, and Jeffrey Epstein was represented by Mark Luttier and Bob Critton of Critton, Luttier, and Coleman LLP in West Palm Beach.

Thanks very much,

[REDACTED]
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
[REDACTED]

From: Weinstein, Marc A. [REDACTED]
Sent: Friday, September 11, 2020 11:11 AM
To: [REDACTED]
Cc: Andrew Tomback <[REDACTED]>
[REDACTED]
Subject: RE: SDNY investigation

[REDACTED], I just realized that you didn't share with us the deponent's name for the transcript you are looking for. Let us know so that we can make the appropriate inquiries.

Best regards,
Marc

EFTA00020875

Marc A. Weinstein | Partner
Chair, White Collar Defense

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From: [REDACTED]
Sent: Thursday, September 10, 2020 11:14 AM
To: Weinstein, Marc A [REDACTED]
Cc: Andrew Tomback [REDACTED]

Subject: RE: SDNY investigation

CAUTION: This email was sent by someone outside of the Firm.

That works well, thanks very much. Talk to you then.

From: Weinstein, Marc A [REDACTED]
Sent: Thursday, September 10, 2020 11:13 AM
To: [REDACTED]
Cc: Andrew Tomback [REDACTED]
Subject: Re: SDNY investigation

[REDACTED] if 11:00 works, I can send a dial-in.

Marc A. Weinstein | Partner
Chair, White Collar Defense

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On Sep 10, 2020, at 10:46 AM, [REDACTED] wrote:

CAUTION: This email was sent by someone outside of the Firm.

Andy and Marc,

Are you available for a brief call tomorrow? I'm available before 1 p.m., if there's a time that works for you in that window.

EFTA00020876

Thanks very much,



Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007

