

From: "██████████)" <██████████>
To: "██████████ (USANYS)" <██████████>
Cc: "██████████ (USANYS)" <██████████>, "██████████ (USANYS)" <██████████>, "██████████ (USANYS)" <██████████>
"██████████ (USANYS)" <██████████>

Subject: RE: RE: plaintiff counsel request for documents, Epstein case

Date: Tue, 31 Dec 2019 19:43:01 +0000

██████████
Following up on our conversation from a few minutes ago, the Civil Division AUSA who handled the requests from counsel following Epstein's suicide was ██████████. As I mentioned, the criminal team is happy to assist any civil AUSA(s) who are the point of contact, and we do think it would make sense to have a formal division to ensure that any necessary protocol is fully established and followed in connection with requests, including this current one, which we understand to be very narrowly tailored. As also discussed, we're happy to take a look at a draft letter to counsel explaining what their formal request should include (nature and status of litigation; what the requests are; and how the requested materials are pertinent to the active litigation, etc.).

Please let us know if any additional information would be helpful, and thanks very much.

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From: ██████████ (USANYS) <██████████>
Sent: Tuesday, December 31, 2019 12:42
To: ██████████) <██████████>
Subject: RE: RE: plaintiff counsel request for documents, Epstein case

You in today?

From: ██████████) <██████████>
Sent: Monday, December 30, 2019 3:49 PM
To: ██████████ (USANYS) <██████████>
Cc: ██████████) <██████████>; ██████████) <██████████>; ██████████ (USANYS) <██████████>; ██████████ (USANYS) <██████████>
Subject: RE: plaintiff counsel request for documents, Epstein case

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Following up on our brief discussion of this issue earlier this month, I wanted to see if you had any additional thoughts on how to handle requests from counsel for plaintiffs who are suing Epstein and his estate who ask us for information or materials in connection with our investigation – I think you had said we should instruct them to submit Touhy Requests, and that you would designate a Civil Division person to whom we could have them direct those requests. If that's right, could you please let us know who that person will be? So far we've just gotten the request from one plaintiff's counsel, Robbie Kaplan at Kaplan Hecker, and her request is very narrow but we want to set up the system in a way that will work if we get additional and/or more expansive requests going forward. And we would like to let her know how she should proceed relatively soon because that case has a status conference on January 10 and I think they'd like to make the request before then.

Please let us know if any other information would be helpful, and thanks as always.

Assistant U.S. Attorney
Southern District of New York