

From: "██████████)" <██████████>
To: Jack Scarola <██████████>
Cc: "██████████)" <██████████>, "██████████ (USANYS)"
<██████████>
Subject: RE: 12/04/09 █████. vs Epstein Deposition Transcript
Date: Thu, 10 Sep 2020 15:30:16 +0000

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,

██████████

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

The email exchange below confirms our inability to locate the first volume of █████ deposition. However, attached are fairly detailed notes of Paralegal/Investigator █████, who attended the deposition and recorded these notes contemporaneously. █████ 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" <██████████>
Date: September 8, 2020 at 3:30:51 PM EDT
To: Jack Scarola <██████████>
Cc: Mary McCann <██████████>, "Wendy P. Calvet" <██████████>,
"cmavsepsteinetalz6385257@projects.filevine.com" <cmavsepsteinetalz6385257@projects.filevine.com>
Subject: FW: 12/04/09 █████. 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 █████ notes from that deposition.

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

Chris,

EFTA00016304

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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