

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II
Date: Mon, 29 Jun 2020 22:44:44 +0000

Perfect, thanks.

From: [REDACTED] <[REDACTED]>
Sent: Monday, June 29, 2020 6:42 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Yep, no problem – order is attached (along with the application and order, in case that's useful too).

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, June 29, 2020 16:02
To: [REDACTED] <[REDACTED]>
Subject: FW: Epstein Sharing Order Part II

Remember way back in late January/early February when we got a second sharing order so we could send all of the trust agreements over to Civ Div? From emails I know it was signed on 2/4 but can't seem to find the actual signed order. Do you by any chance have it?

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, January 31, 2020 11:43 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

OK, I made some idiosyncratic changes, plus a few things highlighted in green for you to verify. I have one Q set forth in the footnote.

From: [REDACTED] <[REDACTED]>
Sent: Friday, January 31, 2020 11:29 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

[REDACTED] is out, but the clerk's office says to use the same miscellaneous number because the applications are related. The prior misc number was: 19 Misc. 0586

And attached for reference in case that's helpful.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, January 31, 2020 10:32
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Working on it right now. [REDACTED], please check with [REDACTED] to see if we should use the same docket no as was assigned to the first 6e order.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, January 31, 2020 9:54 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Great, thanks for catching. [REDACTED], let us know if you have any comments/thoughts. Thanks

From: [REDACTED] <[REDACTED]>
Sent: Friday, January 31, 2020 9:53 AM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Yes, this looks good, thanks – I made one more typo correction in the attached (in the new Trust Two language, “and revocations” got repeated in the footnote and the order) but otherwise no changes.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Friday, January 31, 2020 09:48
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Thanks for flagging, [REDACTED]. I made a few small changes (which I highlighted since we’ve got a fair bit of track already) which I think should make this broad enough to cover the Trust II stuff. Can you take a quick look and if everyone is okay with this, perhaps we can plan to get this to CM on Monday morning? Thanks

From: [REDACTED] <[REDACTED]>
Sent: Thursday, January 30, 2020 7:22 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

I apologize for the delay on this – I’ve added the relevant language about revocations to both the application and the order, and corrected a stray typo, so that stuff is good to go. But two quick things to note, not to belabor this, but – it doesn’t look like there’s any reference to the Trust Two documents – that may be because they’re not referenced in any will? At a glance I don’t see Trust Two in any of the wills, but I’d want to go back and look more thoroughly unless somebody already made the decision on that basis. And second, it references a 2019 Trust but I don’t see any documents on that? I have to run out tonight but can certainly circle up with [REDACTED] and/or [REDACTED] tomorrow on any of this, or just ignore it if I’ve misread.

thanks,
[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Thursday, January 30, 2020 12:05
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Just wanted to circle back on this – [REDACTED], are you signed off? Is this something we could get over to Part I today or tomorrow? Thanks

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, January 29, 2020 3:56 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

[REDACTED], is it the intent to share those? If so, I'll just add it to every mention of each document, but if not then it's unnecessary. I don't think those are substantive docs but I defer.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, January 29, 2020 15:55
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Please add it in the right place and send me the order. Remember, I'm not a T&E lawyer. But you are getting to be

From: [REDACTED] <[REDACTED]>
Sent: Wednesday, January 29, 2020 3:22 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Epstein Sharing Order Part II

Yes, I think this document accurately describes the materials we've received, with just a note that it doesn't appear to include revocations, so to the extent those are intended to be shared, I think that word may need to be added.

thanks,
[REDACTED]

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Wednesday, January 29, 2020 10:40
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: Epstein Sharing Order Part II

[REDACTED] – I've updated the sharing order application to be one to share the additional trust and will documents we have now received. Would you take a look when you can?

[REDACTED] – I've tried to describe the various materials we have gotten from the estate attorneys over the last two weeks. Would you mind taking a look (or asking a paralegal to take a look) to make sure I've accurately described/characterized the new stuff we're looking to share?

Thanks,
[REDACTED]