

From: [REDACTED] <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: Re: Briefing in Florida regarding whether the Florida NPA extends to New York

Date: Fri, 26 Jul 2019 02:12:59 +0000

Happy to chat tomorrow. Name your time that's convenient for you.

[REDACTED] - sent from my iPhone - please excuse brevity and errors.

On Jul 25, 2019, at 8:07 PM, [REDACTED] <[REDACTED]> wrote:

[REDACTED]

Thank you for sending us these materials, we appreciate being able to stay up to date, and we'll continue to keep an eye on the docket for submissions that may be relevant for our investigation.

Separately, might you be available for a quick call sometime tomorrow (Friday) or next week? No rush or emergency, but we wanted to talk with you about a question in connection with your expertise on the CVRA generally. At your convenience.

thanks,

[REDACTED].

From: [REDACTED] <[REDACTED]>
Sent: Thursday, July 25, 2019 13:01
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: Briefing in Florida regarding whether the Florida NPA extends to New York

Hi [REDACTED],

I wanted to make you aware of a recent filing (on Tuesday) by Jane Doe 1 and 2 in the Florida CVRA case. See attached. You may find interesting our argument at pp. 3-6, in which we explain why Judge Marra must craft remedies in the case that relate solely to Florida crimes and Florida victims ... because the NPA only covers Florida.

We filed our reply brief on remedies on Tuesday – and that should have brought all briefing on remedies for the CVRA violation to a close. But yesterday Epstein's lawyer (Marty Weinberg) filed a motion for a sur-reply. See attached. In point (a) on page 2, he argues that he should have an opportunity to file a sur-reply discussing, among other things, the scope of the NPA. On Monday, we will be filing an opposition to Weinberg extending the briefing further. It appears that Judge Marra is poised to rule rapidly on the motion for a sur-reply, as he asked for us to respond quickly.

I wanted to make you aware of these developments. My clients were told back in 2013 that the NPA did not extend to New York or other jurisdictions – and that is the point we are making to Judge Marra.

[REDACTED] for Jane Doe 1 and 2

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] (fax)
[REDACTED]

You can access my publications on [REDACTED]

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