

**From:** "[REDACTED]" >  
**To:** [REDACTED] >  
**Cc:** [REDACTED] >, "[REDACTED]" >, [REDACTED] >, "[REDACTED]" <[REDACTED]>  
**Subject:** Re: Submission on behalf of [REDACTED]  
**Date:** Tue, 17 Mar 2020 20:16:20 +0000

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[REDACTED] — totally understand, and we appreciate you letting us know. That's not a problem.

thanks,  
[REDACTED].

On Mar 17, 2020, at 15:46, [REDACTED] > wrote:

[REDACTED]

I am working on the new draft of this submission but it is going slower than I expected. [REDACTED] has been in an emotionally and psychologically fragile state, and because of the Coronavirus, we cannot get [REDACTED] the proper therapy which [REDACTED] needs. We have suggested [REDACTED] go back to Florida, so at least [REDACTED] can be in [REDACTED] home and not shut up in a stranger's apartment here in NYC. Additionally, we attorneys have all shut our offices and are working at home, leading to a great loss in productivity.

So, realistically I am hoping to get you the new draft tomorrow afternoon.

[REDACTED]

Sent from my iPhone

On Mar 12, 2020, at 8:49 PM, [REDACTED] > wrote:

Confirming receipt, thanks.

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**From:** [REDACTED] >  
**Sent:** Thursday, March 12, 2020 20:40  
**To:** [REDACTED] >  
**Cc:** [REDACTED] >; [REDACTED]; [REDACTED]; [REDACTED]  
**Subject:** Submission on behalf of [REDACTED]

[REDACTED] has shared a link to the following document:



[Submission on behalf of \[REDACTED\]](#)

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profile [REDACTED]



Attached is a draft of the factual statement, just so that you can better understand the facts that we are presenting.

We feel that given [REDACTED] abuse, and given the fact that we see her basically as a cog in Epstein's wheel, acting entirely at his direction and doing what she did at a time that she herself was a very vulnerable victim, a non-pros would be the appropriate disposition. But we want to discuss this with you before we finalize this and make a submission.

Thanks, [REDACTED]

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