

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

Subject: RE: draft response to Epstein defense preservation requests

Date: Tue, 06 Aug 2019 19:01:17 +0000

Attachments: 2019-08-05,_JE,_letter_to_defense_re_preservation_requests.docx; 2019-07-26,_JE,_defense_letter_requesting_preservation_and_production.pdf; 2019-08-01,_JE,_defense_supplemental_letter_requesting_preservation_and_production.pdf

██████████,

This has been in the works for a little while, due to various other things that have come up in the interim, but we didn't want it to get lost given the discovery motion schedule. The attached is based on our conversations with █████, including his email with suggested language for the prefatory language, and responds to the two attached defense letters. Happy to discuss anytime and to incorporate comments and suggestions.

thanks,

██████████.

██████████
Assistant U.S. Attorney
Southern District of New York
██████████

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