

**From:** "[REDACTED] (USANYS)" <[REDACTED]>

**To:** "[REDACTED] (USANYS)" <[REDACTED]>

**Subject:** FW: RE: draft response to Epstein defense preservation requests

**Date:** Wed, 07 Aug 2019 16:06:48 +0000

**Attachments:** 2019-08-05\_JE\_letter\_to\_defense\_re\_preservation\_requests.ebdocx.docx

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As you'll see, I've spent a fair bit of time on this because I presume it will be attached to whatever motion they end up filing. My thoughts in track.

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**From:** [REDACTED] <[REDACTED]>

**Sent:** Tuesday, August 6, 2019 3:01 PM

**To:** [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>

**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>

**Subject:** RE: draft response to Epstein defense preservation requests

[REDACTED],

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 [REDACTED], 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,

[REDACTED].

[REDACTED]  
Assistant U.S. Attorney  
Southern District of New York  
[REDACTED]