

From: "██████████)" <██████████>
To: "Moyne, Parvin" <██████████>
Cc: "Moyer, Thomas" <██████████>, "██████████)" <██████████>
<██████████>, "██████████)" <██████████>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx
Date: Thu, 22 Aug 2019 03:29:11 +0000

Thanks, let's do 10:30 a.m. on Thursday the 12th. Please let us know if your schedule changes, or if it's useful to talk substantively in the interim, and we look forward to seeing you then.

████.

From: Moyne, Parvin <██████████>
Sent: Wednesday, August 21, 2019 20:01
To: ██████████) <██████████>
Cc: Moyer, Thomas <██████████>; ██████████) <██████████>; ██████████)
<██████████>
Subject: Re: 2019.8.15 - SDNY Production Index.xlsx

Either works for us so please choose what is most convenient for you.

Best,
Parvin

On Aug 21, 2019, at 6:45 PM, ██████████) <██████████> wrote:

Parvin,

Not a problem. We could do any time after noon on that Tuesday (the 10th) or any time on the Thursday (the 12th). Would either of those work?

thanks,

████.

From: Moyne, Parvin <██████████>
Sent: Wednesday, August 21, 2019 09:25
To: ██████████) <██████████>
Cc: Moyer, Thomas <██████████>; ██████████) <██████████>; ██████████)
<██████████>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

████,
I'm so sorry for the inconvenience but those dates are not good on our end.

The following week is relatively clear. Might September 9th work? Or other dates that week?

Best,
Parvin

EFTA00020108

From: [REDACTED] <[REDACTED]>
Sent: Tuesday, August 20, 2019 11:58 PM
To: Moyne, Parvin <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

Parvin,

That makes good sense, thanks. Because of the scheduling issues I mentioned, we'd like to set it for a time in early September, if we can – is there a time during the afternoon of September 5 or the morning of September 6 that would work for you? We should be able to do either of those dates and times. Or if not, we can propose possible times the following week.

thank you,

[REDACTED]

From: Moyne, Parvin <[REDACTED]>
Sent: Tuesday, August 20, 2019 14:03
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

[REDACTED] –

Initially, we propose that the lawyers (myself, my colleagues at Akin Gump, and someone from DB Legal) deliver a presentation that provides an overview of Epstein's [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].

In terms of timing, I estimate 2-3 hours for the attorney proffer. (I think closer to 2 hours but I hate to underestimate.)

Best,
Parvin

From: [REDACTED] <[REDACTED]>
Sent: Monday, August 19, 2019 8:14 PM
To: Moyne, Parvin <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

Parvin,

EFTA00020109

Could you please let us know what format we should expect in terms of the proffer? That will help us with figuring out scheduling. I.e., do you expect to make an attorney proffer in the first instance, or should we expect to be meeting with Deutsche Bank personnel, etc? And approximately how long should we be planning to block out?

thanks,

From: Moyne, Parvin <[REDACTED]>
Sent: Monday, August 19, 2019 12:04
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

Hi [REDACTED] –

The proffer may be helpful in guiding you through the production. That said, we can be available whenever makes most sense on your ends.

We have time this week (Thursday or Friday afternoon) and next week (Monday – Wednesday), and we have time in September. If you give us a few options in terms of dates/times, we will sort out schedules on our ends.

Best
Parvin

From: [REDACTED] <[REDACTED]>
Sent: Saturday, August 17, 2019 1:59 PM
To: Moyne, Parvin <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>
Subject: RE: 2019.8.15 - SDNY Production Index.xlsx

****EXTERNAL Email****

Parvin,

We received the index, thank you. In terms of a proffer, what generally did you have in mind regarding timing? I think we'd like to have some time with the subpoena returns to get familiarized, and our team has a combination of travel and trials in the next couple weeks, but we could do early September if that works on your end. Thoughts?

thanks,

[REDACTED].

From: Moyne, Parvin <[REDACTED]>
Sent: Thursday, August 15, 2019 09:48
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Cc: Moyer, Thomas <[REDACTED]>
Subject: 2019.8.15 - SDNY Production Index.xlsx

[REDACTED], [REDACTED] & [REDACTED],

EFTA00020110

Please find attached an index to our productions to date. This is a work in progress – we will update it as we gather and produce additional documents.

Would you like to touch base later today about scheduling a proffer? We are free after 4 p.m.

Best,
Parvin

Parvin Daphne Moyne

AKIN GUMP STRAUSS HAUER & FELD LLP

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