

**From:** [REDACTED]  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Fwd: Follow-up  
**Date:** Fri, 16 Oct 2020 20:33:09 +0000

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Hi [REDACTED],

Do you recall where you left things with this firm about [REDACTED]?

Thanks.

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** [REDACTED] 21, 2020 at 9:18:10 PM GMT+1  
**To:** Colleen [REDACTED]  
**Cc:** Teri Gibbs [REDACTED]  
**Subject:** RE: Follow-up

Colleen,  
Per our discussion – the protective order is attached, as are the Court's opinion on this as well as the Government's strong argument on these issues.

thanks,  
[REDACTED]

**From:** Colleen [REDACTED]  
**Sent:** Friday, [REDACTED] 21, 2020 14:07  
**To:** [REDACTED]  
**Cc:** Teri Gibbs [REDACTED]  
**Subject:** Re: Follow-up

Thank you, [REDACTED]  
I will give you a call today.

Colleen

On Thu, Aug 20, 2020 at 3:05 PM [REDACTED] wrote:

Colleen,  
The times were EST, but I can do 1:00 p.m. PST (4:00 p.m. EST) tomorrow, thanks. We can use the following dial-in:  
[REDACTED]  
conference ID: 698244  
thanks,  
[REDACTED]

**From:** Colleen [REDACTED]  
**Sent:** Thursday, [REDACTED] 20, 2020 15:30  
**To:** [REDACTED]

**Cc:** Teri Gibbs <[REDACTED]>

**Subject:** Re: Follow-up

I am available tomorrow after 1pm (PST). Are your proposed times in PST or EST?

Colleen

On Thu, Aug 20, 2020 at 9:55 AM [REDACTED]

wrote:

Colleen,

I don't, I'm sorry – I'm unfortunately totally booked today. I could talk at 12:30 or 1:00 tomorrow, or sometime early next week, if that's better for you?

thanks,

**From:** Colleen [REDACTED]

**Sent:** Thursday, [REDACTED] 20, 2020 12:08

**To:** [REDACTED]

**Cc:** Teri Gibbs <[REDACTED]>

**Subject:** Re: Follow-up

Do you have time to speak today around 1pm (PST)? Please let me know.

Colleen

On Wed, Aug 19, 2020 at 6:35 PM [REDACTED]

wrote:

Colleen,

Following up on the below – please let us know? Thanks very much.

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**From:** [REDACTED]

**Sent:** Tuesday, [REDACTED] 11, 2020 18:03

**To:** Colleen [REDACTED]

**Cc:** Teri Gibbs <[REDACTED]>

**Subject:** RE: Follow-up

Colleen,

We are happy to speak with you – we had only followed up because we were under the impression she was interested in speaking with us. We certainly can discuss issues of witness safety and confidentiality, but we also are not looking to pressure anyone, at all. Please let us know if it makes sense to chat, and if so, what time ranges would work for you later this week or next.

thanks,

**From:** Colleen [REDACTED]

**Sent:** Monday, [REDACTED] 10, 2020 19:17

**To:** [REDACTED]

**Cc:** Teri Gibbs <[REDACTED]>

**Subject:** Re: Follow-up

Do you have any time to speak this week? My client is deeply concerned about her personal safety and wishes to maintain her anonymity.

Best,

Colleen

On Thu, Aug 6, 2020 at 10:26 AM [REDACTED]

wrote:

Colleen,

We wanted to follow up on this from last month. Please let us know? (And obviously we're past late July now, but we could look at dates and times for an interview this month.)

thanks,

[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, July 08, 2020 17:30

**To:** Colleen [REDACTED]

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

**Subject:** RE: Follow-up

Colleen,

Thanks very much for being in touch, and we would like to speak with Ms. [REDACTED]. As a threshold question, would it be possible for you to share with us the documents from and email correspondence with Maxwell referenced in your email below? And is there a good date or dates later in July that would work for a phone or videoconference interview?

thanks again,

[REDACTED]

**From:** Colleen [REDACTED] <[REDACTED]>  
**Sent:** Monday, July 06, 2020 15:20

**To:** [REDACTED]

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

**Subject:** Re: Follow-up

[REDACTED]

We wanted to follow up on our prior email and offer to speak with our client [REDACTED]. As stated earlier, Ms. [REDACTED] worked for Ms. Maxwell (and, by extension, Jeffrey Epstein).

I confirmed with our client that she is willing to speak with you and wants to fully cooperate with the criminal investigation/action pending against Ms. Maxwell. She could be a valuable witness for you. Please let us know if you would like to speak with our client. We are happy to facilitate this conversation.

Best,

Colleen

On Wed, Jan 29, 2020 at 12:57 PM [REDACTED]

[REDACTED] wrote:

Received, thanks very much.

[REDACTED]

**From:** Teri Gibbs <[REDACTED]>  
**Sent:** Tuesday, January 28, 2020 19:08

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Follow-up

Hi [REDACTED]

As we discussed last week, our client, [REDACTED] has in her possession documents from and email correspondence with Ghislaine Maxwell. Thus far, we have received authorization to share the list of office numbers Ms. [REDACTED] used during her employment with Ghislaine Maxwell from 2003-2007. Please see attached.

Please let us know if you have any questions.

Best,

Teri

On Wed, Jan 22, 2020 at 1:48 PM [REDACTED]

[REDACTED] wrote:

Will do, speak with you then. Thanks.

**From:** Teri Gibbs <[REDACTED]>  
**Sent:** Wednesday, January 22, 2020 16:44

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED] Colleen [REDACTED]

**Subject:** Re: Follow-up

Great. Tomorrow at 12PM PST/3PM EST works. Please call our conference line at [REDACTED]

Best,

Teri

On Wed, Jan 22, 2020 at 1:39 PM [REDACTED]

[REDACTED] wrote:

Teri,

I can give you a call at 3:00 p.m. tomorrow (Thursday). Please let me know what number is best to reach you at, and I'll plan to call you then.

thanks,

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

**Sent:** Tuesday, January 21, 2020 20:15

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]; Colleen [REDACTED]

**Subject:** Re: Follow-up

Wonderful, [REDACTED]. I am available tomorrow through Friday from 1PM-3PM EST. Please let me know what time works best for you.

Best,

Teri

On Tue, Jan 21, 2020 at 5:06 PM [REDACTED]

[REDACTED] wrote:

Teri,

We would be happy to set up a call to speak with you and receive the new information—please let us know a few times this week that would work for you.

thanks,

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

**Sent:** Tuesday, January 21, 2020 18:50

**To:** [REDACTED]

**Cc:** [REDACTED]

[REDACTED]; Colleen [REDACTED]

**Subject:** Re: Follow-up

Hi [REDACTED]

I am following up regarding our clients, [REDACTED] and [REDACTED]. We have more information from Ms. [REDACTED] that may be important to your investigation. Please let us know if you would like to speak with us over the phone or set up interviews with either of them.

Best regards,

Teri

On Mon, Jan 6, 2020 at 1:12 PM Teri Gibbs <[REDACTED]> wrote:

Great. Please call our conference line at [REDACTED]. You should receive an invitation

in a few moments from UberConference. You will not need a sign-in pin.  
Looking forward to our call on Wednesday at 12:30PM PST.  
Best,

Teri

On Mon, Jan 6, 2020 at 1:07 PM [REDACTED]

<[REDACTED]> wrote:

Yes, we can do Wednesday at 12:30 p.m. PST (3:30 p.m. EST). Please let us know the best number to reach you at, and we'll call you then.

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

**Sent:** Monday, January 06, 2020 12:15

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Witness re Prince [REDACTED]

We have a last-minute mediation that is now scheduled for Tuesday. Are you available on Wednesday between 10-11AM PST and 12-2PM PST or Thursday at any time between 9 AM-5PM PST?

Thank you in advance for your flexibility.

Best,

Teri

On Fri, Jan 3, 2020 at 6:04 PM [REDACTED]

<[REDACTED]> wrote:

Teri,

No problem, and thanks for getting back to us. We could do a call on Tuesday the 7th at 11:00 a.m. PST (2:00 p.m. EST). Please let us know the best number to reach you at, and we'll give you a call then.

thanks,

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

**Sent:** Thursday, January 02, 2020 19:26

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Re: Witness re Prince [REDACTED]

Hi [REDACTED]

Thank you for your response. I apologize for the delay. I hope you had a wonderful holiday. Attorney Lisa Bloom and I are available at the following times for a phone or video conference:

- Tuesday (1/7) between 10AM-1PM PST
- Wednesday (1/8) between 10-11AM PST and 12-2PM PST

Please let me know if any of these times work for you.

Best regards,

Teri

On Fri, Dec 20, 2019 at 9:55 AM [REDACTED]

<[REDACTED]> wrote:

Teri,

Thanks for being in touch. In the first instance, before we would request an interview directly, it would be helpful for us to get a full attorney proffer from you about what the

client's information is, what you expect she would convey in an interview, any relevant documentary or other corroborating materials, etc. That way we can make sure we're not re-victimizing any individual unnecessarily, and be efficient with any necessary follow-up interview of the individual him- or herself. Please let us know when a good time would be for an attorney proffer? And we can figure out scheduling.

thanks very much,

**From:** Teri Gibbs [REDACTED]

**Sent:** Thursday, December 19, 2019 20:01

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Witness re Prince [REDACTED]

Hi [REDACTED]

We have a client who witnessed Prince [REDACTED] interactions with [REDACTED]. I would like to set up a phone or video interview with the appropriate party to allow our client to make a statement. Please let me know how to proceed.

Best regards,

Teri Gibbs

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Colleen M. [REDACTED], Esq.

To protect the health and safety of our clients and employees, and in compliance with local orders, The Bloom Firm has closed its physical offices until further notice. **We are fully operational remotely.** Attorneys and staff continue to be available via videoconference, email, telephone, and fax. Please do not send mail or attempt service at our physical office.

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<2020-07-31, GM, signed protective order (docketed).pdf>

<2020-07-31, GM, memorandum & order granting government motion.pdf>

<2020-07-28, government letter re protective order (docketed).pdf>