

From: Jack Scarola <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "[REDACTED]" <[REDACTED]>, "[REDACTED] (USANYS)" <[REDACTED]>
Subject: Re: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript
Date: Thu, 10 Sep 2020 19:46:13 +0000

Please let me know if you are able to locate the transcript.

On Sep 10, 2020, at 11:30 AM, [REDACTED] <[REDACTED]> wrote:

Jack,

Thanks for your email. We will likely reach out to your adversary in the deposition to ask for a copy, but I wanted to check to see whether you had already done so.

Thanks,

[REDACTED]

From: Jack Scarola <[REDACTED]>
Sent: Wednesday, September 9, 2020 9:53 AM
To: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Fwd: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript

The email exchange below confirms our inability to locate the first volume of [REDACTED] deposition. However, attached are fairly detailed notes of Paralegal/Investigator Mike Danchuk, who attended the deposition and recorded these notes contemporaneously. [REDACTED] appears to have held nothing back, and the notes certainly paint a picture of the kind of troubled young women who were particularly susceptible to Epstein's pattern of recruitment, grooming and victimization.

Sent from my iPad

Begin forwarded message:

From: "Chris R. Rodgers" <[REDACTED]>
Date: September 8, 2020 at 3:30:51 PM EDT
To: Jack Scarola <[REDACTED]>
Cc: Mary McCann <[REDACTED]>, "Wendy P. Calvet" <[REDACTED]>, "cmavsepsteinetalz6385257@projects.filevine.com" <cmavsepsteinetalz6385257@projects.filevine.com>
Subject: FW: 12/04/09 [REDACTED]. vs Epstein Deposition Transcript

Jack, below is the "Unable to locate" response from Prose Court Reporting. Visual Evidence, the videography service used, also confirmed on Friday that a copy of the video is no longer available. I have attached Mike Danchuk's notes from that deposition.

From: toni proseflorida.com <[REDACTED]>
Sent: September 7, 2020 7:03 AM

EFTA00023536

To: Chris R. Rodgers <[REDACTED]>
Subject: RE: 12/04/09 [REDACTED] vs Epstein Deposition Transcript

Chris,

I have searched our records and archives and I am unable to locate Volume I of this deposition from 2009.

Sincerely,

Toni

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