

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>
Subject: RE: Agenda
Date: Fri, 06 Nov 2020 20:03:36 +0000

Same here, thank you. And thanks for the agenda!

From: [REDACTED] <[REDACTED]>
Sent: Friday, November 06, 2020 2:16 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Agenda

I'm open other than the two calls we have on the calendar for this case.

From: [REDACTED] <[REDACTED]>
Sent: Friday, November 6, 2020 2:13 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] (USANYS) <[REDACTED]>
Subject: Re: Agenda

What time works for everyone on Wednesday afternoon?

Sent from my iPhone

On Nov 6, 2020, at 2:12 PM, [REDACTED] <[REDACTED]> wrote:

Thanks very much, [REDACTED]! This all looks right to me and makes sense. If we are pushing this past Monday, I'd ask that it be Wednesday afternoon, or anytime Thursday, please. I've got a lengthy grand jury presentation to make on Tuesday.

From: [REDACTED] <[REDACTED]>
Sent: Friday, November 6, 2020 2:09 PM
To: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Agenda

Team,

In preparation for our call (which we can reschedule to a time following the discovery deadline), I wanted to send around a list of topics to discuss for potential next steps. I'm sure I've missed some items, but this is a starting point at a least.

For context, I think we currently expect to call at least the following witnesses at trial:

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

- [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
- *Records custodian from [REDACTED]
- *Records custodian from [REDACTED]
- *Court reporter(s) from [REDACTED]

*We haven't identified/spoken to these witnesses yet, so that's on the trial prep to-do list as well.

The following are some potential next steps – either individuals to interview or re-interview, records to search for/identify, and so forth.

- Relativity review of GM emails
- Identify an [REDACTED] employee (likely retired) who managed donor relations with Epstein/can authenticate documents
- Identify a PBPD detective who can authenticate items recovered from search of PB house
- Talk to [REDACTED] to make sure [REDACTED] has searched all her emails for relevant communications
- Potentially interview [REDACTED] client
- Potentially re-interview [REDACTED]
- Meet with [REDACTED]
- Interview [REDACTED]
- Interview [REDACTED]
- Interview [REDACTED]
- Re-interview [REDACTED]
- Interview [REDACTED]
- Review victim interview notes and interview any outcry witnesses we haven't spoken to yet, including [REDACTED]
[REDACTED]
- Interview [REDACTED]
- Investigate immigration records/travel records re: [REDACTED]
- Re-interview [REDACTED] (with counsel)
- Interview [REDACTED]
- Review deposition transcripts for GM (keeping in mind SOL is approaching)
- Tip-line leads that [REDACTED] flagged

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]
[REDACTED]
[REDACTED]