

From: "Tomback, Andrew" <[REDACTED]>
To: "A." <[REDACTED]>, "Weinstein, Marc A." <[REDACTED]>
Cc: <[REDACTED]>, "Tomback, Andrew" <[REDACTED]>
Subject: RE: subpoena follow-up question
Date: Tue, 19 May 2020 12:27:44 +0000
Inline-Images: image001.png

Marc and/or I will respond to your email below soon – ideally later today.

Regarding my open issue, the Estate won't list any property before June 15.

Stay safe.

Andy

Andrew E. Tomback | Partner
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WHITE & CASE

From: [REDACTED]>
Sent: Monday, May 18, 2020 4:17 PM
To: Tomback, Andrew <[REDACTED]>; Weinstein, Marc A. <[REDACTED]>
Cc: <[REDACTED]>
Subject: RE: [REDACTED] follow-up question

Mark, [REDACTED]

One question I had meant to ask in our call but forgot, on a separate subject – we had briefly discussed in late February our request for photographs and videos in the possession of the estate, and my recollection is that with respect to videos, the estate and trustees were not aware of being in possession of any historical surveillance-type videos (and in particular that any such surveillance video is regularly over-written, and so would not currently exist for any time before, for example, Epstein's suicide), and that separately the estate and trustees were not aware of being in possession of other physical video recordings.

My recollection is that with respect to photographs, that there were some photographs in the properties that had not been the subject of physical search warrants, *i.e.*, the Florida and New Mexico residences. I think we had discussed that the most efficient step, in the first instance, would be for us to receive digital photos of those physical photographs, to whatever extent they exist, but that doing so was not immediately possible at the time of our conversation in late February due to the estate's then-inability to retain or engage anyone to do that.

In the first instance, please let me know if I am getting any of that wrong, and second, understanding that the circumstances of the pandemic may have affected this in the interim, we've been asked to again check with you about whether there is anyone currently working at (or reasonably able to go to) those properties who could convey photographs of any physical photos at those locations? If you could please let us know any sense of possibility / timing on that last outstanding request.

thanks,

[REDACTED].

EFTA00026534

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