

From: "██████████)" <██████████>
To: "██████████ (USANYS)" <██████████>
Cc: "██████████ (USANYS)" <██████████>, "██████████)" <██████████>
"██████████" <██████████>, "██████████)" <██████████>

Subject: RE: draft response to Epstein defense preservation requests

Date: Fri, 09 Aug 2019 17:21:56 +0000

I'm totally available to update it this afternoon if there are edits today, but realistically I don't think the defense can make much more hay about having gotten a response on the 9th versus the 12th

From: █████ (USANYS) <██████████>

Sent: Friday, August 09, 2019 13:20

To: █████) <██████████>

Cc: █████ (USANYS) <██████████>; █████) <██████████>; █████
████) <██████████>

Subject: Re: draft response to Epstein defense preservation requests

If we don't get this out until Monday is that a problem?

Sent from my iPhone

On Aug 8, 2019, at 5:56 PM, █████) <██████████> wrote:

No problem, thanks, and the edits were all straightforward. Updated version attached, everything incorporated, and can go to █████ – I'm out of commission the next couple hours but back after that.

thanks,

████.

From: █████ (USANYS) <██████████>

Sent: Thursday, August 08, 2019 16:36

To: █████) <██████████>; █████ (USANYS) <██████████>

Cc: █████) <██████████>; █████) <██████████>

Subject: RE: draft response to Epstein defense preservation requests

Sorry for the delay. Combined edits from both of us, attached. Can you take a look and clean up – we would then like to give █████ at least the option of weighing in before we send to defense counsel.

From: █████) <██████████>

Sent: Thursday, August 8, 2019 11:44 AM

To: █████ (USANYS) <██████████>; █████ (USANYS) <██████████>

Cc: █████) <██████████>; █████) <██████████>

Subject: RE: draft response to Epstein defense preservation requests

Wanted to bump this from Tuesday, especially since I know you guys are out tomorrow – hopefully we can send it out today? Happy to incorporate any edits etc. Thanks.

From: [REDACTED]
Sent: Tuesday, August 06, 2019 15:01
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>
Subject: RE: draft response to Epstein defense preservation requests

[REDACTED],

This has been in the works for a little while, due to various other things that have come up in the interim, but we didn't want it to get lost given the discovery motion schedule. The attached is based on our conversations with [REDACTED], including his email with suggested language for the prefatory language, and responds to the two attached defense letters. Happy to discuss anytime and to incorporate comments and suggestions.

thanks,

[REDACTED].

[REDACTED]
Assistant U.S. Attorney
Southern District of New York
[REDACTED]

<2019-08-08, JE, letter to defense re preservation requests.docx>

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