

From: "[REDACTED]" <[REDACTED]>
To: "[REDACTED]" <[REDACTED]>
Cc: "Martin G. Weinberg" <[REDACTED]>, "Miller, Michael" <[REDACTED]>, "Weingarten, Reid" <[REDACTED]>, "[REDACTED]" <[REDACTED]>

Subject: Re: U.S. v. Epstein call

Date: Sun, 25 Aug 2019 19:04:28 +0000

Marty,

Following up on our conversation last week, are you able to share with us your thoughts on whether the defense intends to address the Court beyond noting that there is no objection to the dismissal?

Separately, if you could please let us know the status of the return of discovery materials, we would appreciate it. We are hoping to be able to tell the Court on Tuesday that this issue is resolved.

Thanks,

[REDACTED]
Sent from my iPhone

On Aug 22, 2019, at 12:09 PM, [REDACTED] <[REDACTED]> wrote:

Marty,

I got your voicemail from this morning regarding follow-up on civil forfeiture—we have a meeting at 12:30 that I expect will go approximately 15 minutes and will plan to give you (or Mike, to conference you in) a call after that, so approximately around 12:45 – 1:00.

Separately, based on the expected nolle order, and in connection with the protective order in this case, in advance of the hearing on Tuesday can you please either return to the Government all discovery you received in this case and certify that any copies have been security destroyed or deleted, or, alternatively, simply certify that all discovery received has been security destroyed or deleted? (As to the second option, that is to say that you do not need to make additional copies of electronic materials to formally "return" them to us if it is more efficient to simply delete and destroy the existing electronic copies you have.) We want to be able to advise the Court on Tuesday that there are no outstanding discovery obligations on either side based in connection with the protective order.

Thank you,

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