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Attached is the draft protocol we received from Feinberg and co. Also attached are two documents the Estate filed in the USVI today.
Kate

Kate L. Doniger | Kaplan Hecker & Fink LLP
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From: Roberta Kaplan <████████████████████████ >
Sent: Friday, December 13, 2019 4:53 PM
To: ████████████████████████████████████ >; Alex Conlon <████████████████████ >
Cc: █████████████████████████ >
Subject: RE: Transcript from yesterday's conference

That is what Bennet Moskowitz said (I believe) at the earlier conference before M.J. Freeman
Alex: can you pls check the transcript? I know they have also said it to me directly and he certainly didn't disagree with me when I said it before J Failla.

Also: we got the Feinberg draft protocol today; its exactly as much of a disaster as we expected.
Kate: psl send to ████ along with their recent VI filings.

Roberta ("Robbie") Kaplan, Esq.
Kaplan Hecker & Fink LLP
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From: ████████████████████████████████ >
Sent: Friday, December 13, 2019 1:09 PM
To: Alex Conlon <████████████████████████ >; Roberta Kaplan <██████████████████████ >
Subject: RE: Transcript from yesterday's conference

This is helpful and interesting, thanks very much for sending. Among other things, notable that Judge Failla assumes, even were punitive damages to be excluded, a claim "for millions upon millions of dollars."

Separately, Robbie, I noticed near the end of the conference you mentioned, at p. 27, that: "They [the estate and/or the trustees?] have identified the sole beneficiary as Mr. Epstein's brother." I'm wondering if you might have a recollection of what the estate has said or represented to you about that? And if you recall whether any discussion of beneficiaries was in connection with the will versus the trust versus the estate, etc. Just if you feel comfortable sharing any of that

information, of course—no obligation at all. And if it's more convenient to relay in real time, rather than drafting up an email, please don't hesitate to give a call. No emergency or rush, but did want to ask.

thanks,

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From: Alex Conlon <████████████████████>
Sent: Thursday, December 12, 2019 18:34
To: ████████████████████████████████████>
Cc: Roberta Kaplan <████████████████████>
Subject: Transcript from yesterday's conference

Hi there,

Attached is the transcript from yesterday's conference that Robbie described in the call today.

Take care,
Alex

Alex Conlon | Kaplan Hecker & Fink LLP

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