

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
SUPPLEMENT¹ TO MOTION FOR COURT TO DECLARE RELEVANCE AND NON-
PRIVILEGED NATURE OF DOCUMENTS AND WITH SPECIFIC REQUEST FOR *IN*
CAMERA REVIEW TO DETERMINE RELEVANCE, INAPPLICABILITY AND/OR
WAIVER OF ATTORNEY-CLIENT PRIVILEGE AND ATTORNEY WORK PRODUCT
WITH REGARD TO SEALED DOCUMENTS**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), moves this Court for an *in camera* inspection to confirm the relevance of, and the absence and/or waiver of, any attorney-client privilege and work-product protection for the 47 documents² identified on Epstein's Clerk's Trial Exhibit List which Counter-Plaintiff Bradley J. Edwards ("Edwards") has improperly withheld from discovery, and for the Court to find that all such documents withheld on the basis of irrelevance, attorney-client privilege and attorney work product should be unsealed, produced and deemed admissible at trial, and states:

¹The original Motion was filed on March 5, 2018, but not ruled on before the March 9, 2018, appellate court stay.

²Edwards identified 49 e-mails on Epstein's Clerk's Trial Exhibit List that he alleged were privileged, however, two of those e-mails were pages within other exhibits and the total number of alleged "privileged" exhibits is 47. Epstein may be able to reduce the number of documents for the Court's *in camera* review even further if the Court will unseal the exhibits so Epstein's counsel can review them and select those most dispositive of the issues Edwards has made central in this case.

PREFACE

No Court, not this Court or the Special Master appointed by the Bankruptcy Court, has ever conducted an *in camera* inspection of the documents identified on Edwards' February 23, 2011 privilege log³ ruled by this Court to be legally deficient and in violation of Florida Rules of Civil Procedure and binding legal precedent. Now that the appellate court has made this time available to address pending matters, it is up to this Court to determine whether Edwards may continue to conceal and withhold from the jury clearly relevant, case-ending evidence that makes it impossible for Edwards to satisfy his heavy burden to establish a cause of action against Epstein for malicious prosecution. Although Epstein is asking the Court to conduct a limited *in camera* review of 47 documents⁴, none of the documents, in fact, are attorney-client communications, and Edwards has waived his work-product protections with regard to those documents. Once this Court confirms, as it should, that none of the 47 documents reflect communications between Edwards and his clients, and therefore that they are not subject to the attorney-client privilege, these documents should be permanently unsealed, deemed produced and ruled to be admissible, and Epstein should be permitted to introduce them as evidence at trial.

INTRODUCTION

The 47 documents (referred to as "e-mails") that Epstein asks this Court to review *in camera* directly relate to the strength of Edwards' clients' cases against Epstein, Edwards'

³The February 23, 2011 privilege log was prepared by Edwards when he was working at the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. ("Farmer Jaffe"), which is now dissolved. While the privilege log is entitled in the name of that firm, for purposes of this Motion, it will be referred to as "Edwards' privilege log."

⁴Epstein has segregated the newly identified e-mails from his March 5, 2018, Clerk's Trial Exhibit List, which include the 47 documents Edwards claims are "privileged" as well as other documents over which a privilege has not been claimed. Pursuant to the Court's direction at the March 8, 2018, hearing, to preserve his appellate rights, Epstein will file those exhibits under seal upon the Court's entry of a sealing order. To assist the Court, the 47 exhibits for the Court's *in camera* review are identified on **Exhibit A**.

association and interaction with Scott Rothstein (“Rothstein”), Edwards’ damages claim, and the overall credibility of Edwards’ allegations against Epstein. These e-mails are not only relevant and material, they eviscerate Edwards’ case, making it impossible for him to satisfy his heavy burden to prove the absence of probable cause for Epstein to have filed suit against him. Epstein is entitled to have the Court and jury consider these e-mails as it determines whether Epstein exceeded the wide latitude which the law confers on all plaintiffs “to use their best judgment in prosecuting . . . a lawsuit without fear of having to defend their actions in a subsequent civil action for misconduct.” *Echevarria, McCalla, Raymer, Barrett & Frappier v. Cole*, 950 So. 2d 380, 384 (Fla. 2007)(quoting from *Levin, Middlebrooks, Mabie, Thomas, Mayes Mitchell, P.A. v. United States Fire Ins. Co.*, 639 So. 2d 606, 608 (Fla. 1994)).

As explained fully below, Edwards has improperly withheld these undeniably relevant e-mails from valid discovery requests for more than eight years after having waived any even remotely arguable protection that might apply to them. Further, in order to ensure that the e-mails would never see the light of day, Edwards concealed their existence by hiding them within a deceptively worded 1,607-entry, 159-page privilege log that this Court found was insufficient on its face and did not comply with the requirements of Florida Rule of Civil Procedure 1.280(b)(5)⁵ and *TIG Ins. Corp. v. Johnson*, 799 So. 2d 339 (Fla. 4th DCA 2001). Despite Edwards’ efforts, however, the e-mails have been discovered (albeit inadvertently). Lacking any legal justification for withholding them in the first place, and having concealed this misconduct through a deceptively vague and non-compliant privilege log designed to ensure that the existence of these documents would never be detected, Edwards is now left with no choice but to protest wildly with unfounded

⁵Florida Rule of Civil Procedure 1.280 has been amended since the Court’s Order and privilege claims are now addressed in subsection (6) of that Rule.

allegations of “stolen” e-mails hoping that this will distract this Court from its duty to conduct an examination of the documents Edwards has so improperly withheld and concealed.

This Court has repeatedly expressed its intention to maintain a level playing field between the parties in order to ensure a fair trial. This Court has correctly recognized that in his malicious prosecution cause of action against Epstein, Edwards has an onerous burden to establish a total absence of probable cause for Epstein to have commenced and continued his lawsuit. In that regard, the elements of a malicious prosecution claim are deliberately onerous. It is the only cause of action in Florida that escapes application of the litigation privilege and the absolute immunity that privilege affords to plaintiffs and their counsel, so that they may feel free to use their best judgment to prosecute their claims without fear of a retaliatory civil lawsuit. *Echevarria* at 384. The heavy burdens built into the elements of malicious prosecution are imposed in lieu of the absolute litigation privilege, so that a malicious prosecution claim may not be used as a tool to chill putative plaintiffs, such as Epstein, from bringing suit. It is not automatically available to all who are able to defend against a lawsuit without a resulting recovery against them. Rather, it is only available in those extremely rare instances in which a successful defendant can prove that the plaintiff had absolutely no basis to file suit against him in the first place. Thus, in order for Edwards to recover against Epstein for filing suit against him, Edwards is put to the substantial task of demonstrating that Epstein had no probable cause for filing suit against him.

Because Edwards must demonstrate a complete absence of probable cause to recover against Epstein, all Epstein need show to defeat Edwards’ counterclaim is the barest showing of probable cause, the standard for which has been aptly described as “extremely low and easily satisfied.” *Gill v. Kostroff*, 82 F. Supp. 2d 1354, 1364 (M.D. Fla. 2000).⁶ Epstein maintains that

⁶ See *Wright v. Yurko*, 446 So. 2d 1162, 1166 (5th DCA 1984)(“Probable cause in the context of a civil suit is measured by a lesser standard than in a criminal suit. But obviously less in the way of grounds

he has already established probable cause as a matter of law based upon, among other things: (a) undisputed extrinsic evidence of Rothstein's Ponzi scheme; (b) a third-party lawsuit alleging the use of case files from Edwards' client cases against Epstein to support the Ponzi scheme; and (c) the identification of specific litigation misconduct by Edwards that corroborates the third-party allegations that the purpose of the litigation misconduct was to enhance the value of those cases to more effectively use them to lure investors into the Ponzi scheme.

Edwards disputes none of the evidence proffered by Epstein and provides no direct evidence of Epstein's state of mind. Instead, he asserts that Epstein could not have relied on this evidence for probable cause. As support for this assertion, Edwards sets up as the central issues in the trial of his counterclaim against Epstein: (a) the strength of his clients' cases against Epstein; (b) the lack of any association between Rothstein and either Edwards or Edwards' clients' cases against Epstein; and (c) the legitimacy of Edwards' litigation conduct in his clients' cases against Epstein. Edwards further claims that he has suffered and continues to suffer damages arising out of his "anxiety" from Epstein's complaint that was filed more than eight years ago and dismissed six years ago because it: (a) falsely characterized Edwards' cases as "weak"; (b) indicated that Edwards knew or should have known of Rothstein's Ponzi scheme; and (c) alleged that Edwards engaged in litigation conduct to support the Ponzi scheme.

This Court has already given Edwards substantial latitude to present to the jury circumstantial evidence bearing on Epstein's criminal history, his non-prosecution agreement with

for belief will be required to justify a reasonable man in bringing a civil rather than a criminal suit.... [T]he instigator need not have the same degree of certainty as to the facts, or even the same belief in the soundness of his case, and that he is justified in bringing a civil suit when he reasonably believes that he has a good chance of establishing it to the satisfaction of the court or jury. He may, for example, reasonably submit a doubtful issue of law, where it is uncertain which view the court will take.”).

the government, settlements with Edwards' three clients, and the existence and settlement of other civil claims against Epstein in order to aid Edwards in disputing specific allegations in Epstein's original complaint and positing ulterior motives for Epstein's lawsuit against Edwards. For the playing field to be level, if there is evidence regarding Edwards' conduct that has a direct bearing on whether Epstein had probable cause to commence or continue the lawsuit, whether Edwards in fact incurred any damages as a result of Epstein's lawsuit, or indeed whether Edwards' allegations against Epstein are at all credible, it is imperative that such evidence be laid bare before the jury. To bring to life this Court's intention to level the playing field in a trial where the law imposes an onerous burden on Edwards to recover against Epstein for exercising the right that all plaintiffs have to seek legal redress through the courts, this Court must allow the jury to review these e-mails and fully evaluate Edwards' misconduct, the true value of his clients' cases and the anxiety damages claimed by Edwards to justify recovery against Epstein.

**THIS COURT MUST FIND THAT NO WORK-PRODUCT
PROTECTION EXISTS OR THAT IT WAS WAIVED**

I. Edwards Expressly Waived Work Product Objections for All but New and Ongoing Cases against Epstein

Edwards expressly, and on multiple occasions, waived work-product protections. In negotiating the preparation of the privilege log on February 2, 2011, Farmer Jaffe informed Epstein's counsel and the Special Master that it would omit from the log any work product objections that related to closed cases:

All work product materials **will be turned over to Plaintiff except for materials related to new or ongoing cases**, AND on the condition that they be produced "For Attorneys' Eyes Only."

(Exhibit B.) Farmer Jaffe told the Special Master he would then only need to review and make privilege determinations as to work product materials for *existing* cases and attorney-client privilege materials. *Id.*

Farmer Jaffe confirmed this agreement more than once:

[February 9, 2011] “We also have 2 more boxes that contain **work product materials** what we will turn over subject to the agreement that Plaintiff will not assert any privilege has been waived by turning them over now, and further subject to the agreement that they be produced ‘For Attorneys’ Eyes Only.’” (**Exhibit C.**)

[February 16, 2011] Farmer: “Do you still want to do the attorney’s eyes only? Do you want to speed it up or not? **You’ll get work-product stuff** if you agree to the attorney’s-eyes only.” Epstein’s counsel confirmed their agreement. (**Exhibit D.**)

This representation was significant. At the time Farmer Jaffe made this representation to Epstein, the three cases Edwards had been litigating against Epstein while he was Rothstein’s partner at Rothstein Rosenfeldt & Adler (“RRA”) had long been settled (in **July 2010**). Thus, based on Farmer Jaffe’s representation, Edwards was supposed to have produced all e-mails reflecting work product pertaining to the three closed Epstein cases because they did not pertain to “new or ongoing cases.” While at the time of the production Edwards had other clients who had claims against Epstein, those, too, have now long been settled⁷, and none of those claims remain *pending against Epstein*.

Although Edwards did, in fact, produce documents as “attorneys’ eyes only” in February 2011, it has now come to light that Edwards only produced *select* items, and specifically withheld inculpatory e-mails pertaining to his closed cases against Epstein, despite Edwards’ agreement not to withhold work product pertaining to the closed cases.⁸ To the extent that the 47 e-mails

⁷Edwards settled his last clients’ claims against Epstein in August 2011.

⁸To the extent that Edwards claims documents relating to L.M. and E.W. were not produced because of some tangential privilege based on the pending Crimes Victims’ Rights Act (“CVRA”) action against the United States Government, this lacks merit. None of the subject e-mails are communications between the government and Edwards’ clients or their counsel or implicate any issues relevant to the CVRA case. Importantly, other than filing a Notice of Change of Address in the CVRA action in April 2009 when Edwards joined RRA, *Edwards did nothing in that action while he was at RRA*. In fact, the first filing Edwards made in the CVRA action after April 2009 was in September 2010 after the court administratively closed the case for inactivity – almost a year after Edwards left RRA. (See excerpt of CVRA Court Docket attached as **Exhibit E.**)

identified for the Court's *in camera* review relate to actual cases Edwards litigated against Epstein, they were closed cases. If work-product protection ever even arguably applied to them, the e-mails were not then work product from "new or ongoing cases," and should have been included in the production to Epstein's counsel that Edwards represented included all work product except for "new or ongoing cases." Moreover, because all of Edwards' clients' claims against Epstein have now settled, in reliance on Edwards' previous waiver and agreement to produce the same, Epstein is asking the Court to compel Edwards to produce *all* such e-mails withheld based on work product, or at least to deem the 47 e-mails to have been produced, and unseal them. In view of Edwards' waiver regarding work product from closed cases, an *in camera* review of those e-mails is unnecessary and the Court need not make any further determinations. For the additional reasons explained below, Epstein also asks that this Court rule the 47 e-mails to be admissible at trial.

II. Work-Product Protection Was Waived by Sharing with Third Parties – as Edwards Admittedly Did With Razorback

Additionally, Edwards' counsel conceded on March 8, 2018, that the e-mails were shared with the Conrad, Scherer law firm -- counsel for Razorback. Clearly, Razorback sought their production to prove its allegations in the *Razorback* lawsuit that Rothstein used the three cases against Epstein, in part, to lure investors into the Ponzi scheme. If Edwards provided the documents that he claims are privileged (both attorney-client and work product) in this case to Conrad, Scherer, then Edwards waived those privileges when Edwards produced the e-mails to Conrad, Scherer. As a result of that waiver, none of the e-mails were properly withheld by Edwards on the basis of attorney-client privilege, and all should now be deemed to have been produced, unsealed and ruled admissible at trial.

III. Work-Product Protection Was Waived by Edwards' Issue Injection

- *Anxiety Damages for Being Sued*
- *"Weak" Cases*
- *"I Did Nothing Wrong"*

Among other things, the e-mails relate directly to the strength (or lack thereof) of Edwards' now-settled three clients' cases against Epstein, the extent of Rothstein's interaction with Edwards as it relates to those cases, and the credibility of Edwards' claims for damages based on "anxiety" he claims to have suffered and continues to suffer from Epstein's lawsuit. Repeatedly, Edwards has made these central issues in his malicious prosecution counterclaim against Epstein. Because the e-mails directly relate to the very issues Edwards injected into his malicious prosecution counterclaim, they are critical to a proper evaluation of its merits, and any work-product protection that may have applied to them should be deemed to have been waived by reason of Edwards' issue injection.

Both Edwards' and Epstein's counsel are familiar with waiver of work-product protection by issue injection, having litigated the issue previously. *See Tolz v. Geico General Ins. Co.*, No. 08-80663, 2010 WL 384745 (S.D. Fla. Jan. 27, 2010). In *Tolz*, non-party Searcy Denney argued that the "doctrine of waiver by issue injection" did not apply (to attorney-client privilege). *Id.* at *2. After analyzing both the attorney-client privilege and the work-product doctrine, the court concluded that the attorney-client privilege had not been waived. *Id.* at *4. However, the court cited federal case law recognizing that the work-product protection "is not inviolate and may be invaded when the information contained within the work-product materials is directly at issue." *Id.* (emphasis added). In *Tolz*, therefore, the court did exactly what this Court should do – ordered an *in camera* review to determine whether any privilege existed or had been waived by placing the information contained in the documents directly at issue in that action. *Id.* at *5.

Case law distinguishes between affirmatively injecting an issue rather than simply defending one. *Home Ins. Co. v. Advance Machine Co.*, 443 So. 2d 165, 168 (Fla. 1st DCA 1983) (no waiver in simply bringing or defending an action). Exceptions to the general rule have been applied where the party seeking to avoid discovery has injected into the litigation issues going to the very heart of the litigation. *Id.*, citing *Hearn v. Rhay*, 68 F.R.D. 574 (E.D. Wash. 1975); *Pitney-Bowes, Inc. v. Mestre*, 86 F.R.D. 444 (S.D. Fla. 1980).

Here, unlike in *Tolz*, Edwards has repeatedly injected issues into this litigation in an attempt to satisfy Edwards' burden to establish Epstein's lack of probable cause, which goes to the very heart of Edwards' malicious prosecution cause of action. Edwards has therefore waived any work-product protection of evidence relevant to these issues. The case for waiver by issue injection is even stronger because the content of the e-mails in question reflects admissions by Edwards and his co-counsel as to the very issues Edwards has injected in this case, the evidence of which is simply unavailable through any other means.

IV. Edwards' Deceptive Concealment of the 47 E-mails on a Legally Deficient Privilege Log in Violation of Florida Rules of Civil Procedure, Binding Precedent and the Express Orders of this Court is a Further Waiver

Edwards' waiver is further mandated by his deliberate concealment of the e-mails in question on a 159-page privilege log that was determined by this Court on May 7, 2012 to be legally deficient on its face and to have utterly failed to comply with the legal requirements of Florida Rule of Civil Procedure 1.280(b)(5) and *TIG Ins. Corp. v. Johnson*, 799 So. 2d 339 (Fla. 4th DCA 2001). (**Exhibit F.**) It was through this device that Edwards prevented the e-mails from ever seeing the light of day despite Edwards' misrepresentations to Epstein's counsel that all e-mails qualifying as work product in closed cases against Epstein had been produced. While the e-mails remained concealed through Edwards' improper device, Edwards continued to prosecute his

counterclaim against Epstein based on the very issues directly refuted by e-mails Edwards concealed from existence. Edwards should not be rewarded for such unethical gamesmanship.

The *TIG* court denied a petition for a writ of certiorari seeking review of an order requiring TIG to produce documents for which objections on the basis of attorney-client and work-product privileges were made. The Fourth District Court of Appeal noted that Florida Rule of Civil Procedure 1.280(b)(5) [now (6)] is identical to its federal counterpart, Federal Rule of Civil Procedure 26(b)(5), whose Advisory Committee Notes state that: “To withhold materials without such notice is contrary to the rule, subjects the party to sanctions under rule 37(b)(2) and may be viewed as a waiver of the privilege or protection.” *TIG* at 340. The *TIG* court further observed that Local Rule 26.1(G)(3)(b) of the United States District Court for the Southern District of Florida spelled out the requirements for a valid privilege log:

Where a claim of privilege is asserted in objecting to any interrogatory or document demand, or sub-part thereof, and an answer is not provided on the basis of such assertion:

(i) The attorney asserting the privilege shall in the objection to the interrogatory or document demand, or sub-part thereof, identify the nature of the privilege (including work product) which is being claimed and if the privilege is being asserted in connection with a claim or defense governed by state law, indicate the state’s privilege rule being invoked; and

(ii) The following information shall be provided in the objection, unless divulgence of such information would cause disclosure of the allegedly privileged information:

(A) For documents: (1) the type of document; (2) general subject matter of the document; (3) the date of the document; (4) such other information as is sufficient to identify the document for a subpoena duces tecum, including, where appropriate, the author of the document, the addressee of the document, and where not apparent, the relationship of the author and addressee to each other. ...

The Fourth District Court of Appeal also quoted with approval from *Abbott Laboratories v. Alpha Therapeutic Corp.*, No. 97-C-1292, 2000 WL 1863543 (N.D. Ill. Dec. 14, 2000), in which the court stated that a privilege log should:

... also describe the document's subject matter, purpose for its production, and a specific explanation of why the document is privileged or immune from discovery. These categories, especially this last category, must be sufficiently detailed to allow the court to determine whether the discovery opponent has discharged its burden of establishing the requirements expounded upon in the foregoing discussion. Accordingly, descriptions such as “letter re claim,” “analysis of claim,” or “report in anticipation of litigation”—with which we have grown all too familiar—will be insufficient. This may be burdensome, but it will provide a more accurate evaluation of a discovery opponent's claims and takes into consideration the fact that there are no presumptions operating in the discovery opponent's favor. Any failure to comply with these directions will result in a finding that the plaintiff-discovery opponents have failed to meet their burden to establish the applicability of the privilege.

Id. at *3 (citations omitted).

Simply put, a privilege log must be sufficient on its face to allow the reviewer to understand enough to determine whether a privilege claim should be challenged.

On August 17, 2012, the Court vacated the May 7, 2012, Order, but did not relieve Edwards of the requirement to provide a new fully compliant privilege log. In fact, the Court's August 17, 2012, Order provides, in pertinent part:

EDWARDS shall file a written response specifically addressing the production sought in Paragraph 13 of EPSTEIN's Motion to Compel and Amend Protective Order of March 9, 2012 as Ordered in this Court's April 10, 2012 Order. The response shall identify non-privileged responsive documents previously produced, shall be accompanied by all non-privileged responsive documents not previously produced, if any **and shall identify, in a proper privilege log as referenced in this Court's May 7, 2012 Order**, responsive documents withheld from production on the basis of any assertion of privilege. This response shall be filed within 10 days from the date of this Order.

(August 17, 2012, Order) (emphasis added) (**Exhibit G**). Edwards failed to provide a compliant privilege log as required, his February 23, 2011 privilege log is clearly invalid and the protections asserted thereunder should be deemed to have been waived in light of Edwards' failure to comply with the Court's Order.

Because Edwards blatantly disregarded the Court's Order, as well as the requirements of Florida's Rules of Civil Procedure and the *TIG* case, the February 23, 2011 privilege log remains

wholly deficient. It misstates objections, improperly identifies or altogether excludes the required identities of the document authors and recipients, and its document descriptions are deceptively vague and misrepresent the true nature of the documents listed on the privilege log. Had Edwards ever provided a legally sufficient privilege log, Epstein would have been afforded the opportunity to identify as early as February 23, 2011, the improper assertions of attorney-client privilege, work-product protection and irrelevancy made by Edwards with respect to the 47 e-mails. Because the e-mails are under seal, Epstein cannot specifically address the content of each to demonstrate how Edwards was able to conceal them through his legally deficient and non-compliant privilege log. However, the following few examples of the numerous defects in the privilege log will enable this Court to readily confirm the complete deficiency of Edwards' invalid privilege log, both generally and particularly as it relates to the 47 e-mails in question⁹:

- Individuals who were copied either by cc or bcc on e-mails were not identified on the privilege log. Throughout the privilege log, Edwards also generally referred to the sender or recipients of the e-mails using unlawful group descriptions such as "Attorneys at RRA," or "RRA Staff," or identified them as "Confidential Sources" without any basis in law for such identification. In fact, 189 entries refer to a "Confidential Source" to which a work product objection was asserted.¹⁰ Such vague identification made it possible to conceal from Epstein the highly relevant fact that Rothstein was either the author or a recipient of the e-mails in question.
- Edwards provided wholly insufficient document descriptions on his privilege log. For example, 394 entries included the document description "Litigation Strategy." Many of these are included in the 47 e-mails for the Court's review (e.g., Appendix #36/Trial Exhibit 13-7; Appendix #70/Trial Exhibit 13-17). As another example, on page 81 of the privilege log, the description for Bates 01527 (Appendix #3/Trial Exhibit 13-5) is given as "New Victim" however, the Court's cursory review of that document may demonstrate that description to be improperly vague, false and misleading.

⁹ **Exhibit A** provides a comparison of the 47 e-mails as identified on Epstein's Clerk's Trial Exhibit List to Edwards' privilege log entries. Edwards' complete privilege log is attached as **Exhibit H**.

¹⁰ In May 2012, Edwards produced more than 80 e-mails with "Confidential Sources" that he had previously withheld based on a work product privilege which are identified on his privilege log. Those documents were identified on Epstein's November 2017 Exhibit List. See **Exhibit I**.

Bates	Date	To	From	Description	Objection
1527	04/27/2009	Marc Nurik	Bradley Edwards	New Victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights.

- Edwards objected to 938 entries on the privilege log on the basis of the documents being “irrelevant & not reasonably calculated to lead to the discovery of admissible evidence.” The 47 e-mails Epstein asks this Court to review *in camera* are highly relevant and do lead to the discovery of admissible evidence and the Court’s review alone of this limited number of documents will confirm that. In fact, by just getting a flavor of the e-mails, this Court already determined them to be detrimental to Edwards’ counterclaim and beneficial to Epstein’s defense of the same. The following is but one example of how the document shown to the Court at the March 8, 2018, hearing (Appendix #1/Trial Exhibit 13-67) is portrayed:

Bates	Date	To	From	Description	Objection
04403-04416	10/17/09	Paul Cassell	Bradley Edwards	Punitive Damages	W/P; Attorney Client Privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence ; protected by privacy rights

- Edwards objected to 994 entries on the basis of “work product” and “attorney-client” privilege, however, only 19 of those entries were with a client. As set forth above, Edwards’ “work product” objections throughout the privilege log, if even remotely applicable, were waived by reason of Farmer Jaffe’s express agreement to produce work product documents for claims that were no longer pending, the prior production of the same documents to Razorback’s counsel or Edwards’ issue injection. In addition, the failure to identify the client as an author or recipient of the document, coupled with a vague and misleading document description ensures that no specific claim of attorney-client privilege could ever be evaluated without seeking court review of every one of the 994 entries on the privilege log as to which attorney-client privilege was asserted.

This Court should not countenance Edwards’ concealment of material evidence directly relevant to issues he has made central to this case in flagrant disregard for the Florida Rules of Civil Procedure, established precedent and the orders of this Court. Rather, as authorized in *TIG*, the Court should deem Edwards’ misconduct to have effected a waiver of objections with respect

to the 47 e-mails, unseal that evidence, deem it to have been produced to Epstein and rule it admissible at trial.

NO ATTORNEY-CLIENT PRIVILEGE EXISTS

Despite Edwards' and Paul Cassell's (counsel for the intervenors) protestations to the contrary, the 47 e-mails are not attorney-client privileged communications between Edwards (or any other co-counsel) and his three tort clients (L.M., E.W. or Jane Doe). Rather, the majority of the documents are e-mails among attorneys and staff within RRA, with Mr. Cassell, and with media sources and do not qualify for that protection as codified in section 90.502 of the Florida Statutes.

Under Florida's Evidence Code, "[a] client has a privilege to refuse to disclose, and to prevent any other person from disclosing, the contents of confidential communications when such other person learned of the communications because they were made in the rendition of legal services to the client." § 90.502(2), Fla. Stat. (2017). A communication between lawyer and client is "confidential" if it is not intended to be disclosed to third persons other than:

1. Those to whom disclosure is in furtherance of the rendition of legal services to the client.
2. Those reasonably necessary for the transmission of the communication.

Las Olas River House Condo. Ass'n, Inc. v. Lorh, LLC, 181 So. 3d 556, 557–58 (Fla. 4th DCA 2015); § 90.502(1)(c), Fla. Stat. (2017). The second exception applies to agents of the client—for example, when a family member acts on behalf of an incapacitated relative, *Witte v. Witte*, 126 So. 3d 1076 (Fla. 4th DCA 2012), or when a messenger is needed for a client to contact counsel, *Gerheiser v. Stephens*, 712 So. 2d 1252 (Fla. 4th DCA 1998). Nothing in the description of the 47 e-mails, including the identification of the sender or recipients of the same, or the description of the e-mails themselves, provides any basis to conclude that the documents constitute or reflect attorney-client communications in the rendition of legal services to a client.

Furthermore, the attorney-client privilege may be disregarded under certain circumstances. For instance, the privilege may be disregarded where client permission was granted to disclose a privileged communication to an adverse third party, as was apparently true in the case of Edwards' disclosure of the e-mails to Conrad, Scherer, or as was also true in the case of Edwards' disclosure of attorney-client communications with L.M. and E.W. in filings in the CVRA action. Additionally, there is no privilege for an attorney-client communication if the lawyers' services were "sought or obtained to enable or aid anyone to commit or plan to commit what the client knew was a crime or fraud." § 90.502(4)(a), Fla. Stat. This is known as the "crime fraud" exception to the privilege. *See Douberley v. Perlmutter*, 219 So. 3d 854 (Fla. 4th DCA 2017).

Thus, several bases to challenge Edwards' assertion of the attorney-client privilege were available to Epstein had there been a legally compliant and adequate description in the privilege log of any document as to which Edwards asserted that privilege. This Court's *in camera* review of the 47 e-mails will confirm that no attorney-client privilege applies. Moreover, in the event that this Court isolates an e-mail to which the attorney-client privilege might conceivably apply, it may consider Edwards' refusal to provide a privilege log in which that e-mail was sufficiently identified in a manner that complies with Florida Rules of Civil Procedure and the binding precedent of the *TIG* case. As confirmed in *TIG*, Edwards' refusal to provide a *TIG*-compliant identification may be viewed as a waiver, either as a concession by Edwards that no valid attorney-client privilege ever existed with respect to that e-mail or that, if it ever did, it was waived, including under any of the circumstances described above.

**IN CAMERA REVIEW IS MANDATED BY LAW, WAS AGREED TO BY THE
PARTIES AND IS APPROPRIATE UNDER THE CIRCUMSTANCES**

No court or special master has ever determined the relevancy, privilege or waiver of the e-mails identified on Edwards' privilege log, but it is well within this Court's jurisdiction to do so now. Indeed, if a party seeks to compel the disclosure of documents that the opposing party claims are protected by attorney-client privilege and/or work-product protection, a trial court's *in camera* review of the documents prior to disclosure is required by law. *Bennett v. Berges*, 84 So. 3d 373, 375 (Fla. 4th DCA 2012); *Old Holdings, Ltd. v. Taplin, Howard, Shaw & Miller, P.A.*, 584 So. 2d 1128, 1128–29 (Fla. 4th DCA 1991) (finding that where documents may be protected by both the attorney-client privilege and the work-product doctrine, the petitioners are entitled to an *in camera* review of the documents by the trial court prior to disclosure).

Moreover, Edwards has already agreed to an *in camera* review:

...we're not attempting to hide anything. You want to conduct an in-camera inspection, we want you to conduct an in-camera inspection because it will confirm that we're not attempting to hide anything.

(3/8/18, Aft. Tr. (Scarola), p. 15.) (Excerpt, **Exhibit J.**) Epstein now expressly moves for the Court to conduct that review limited to the 47 e-mails.

This entitlement to *in camera* inspection of materials claimed to be privileged is a two-way street and a right that either party is entitled to under Florida law. *See Zanardi v. Zanardi*, 647 So. 2d 298 (Fla. 3d DCA 1994) (petition for writ of certiorari granted when trial court denied motion to copy computer diskettes on basis of attorney-client privilege and trial court did not determine *in camera* whether assertion of the privilege was valid). This reciprocal approach is fair and logical because without the review, the party objecting to disclosure of potentially privileged material can be irreparably harmed (“cat out of the bag”), and the party seeking disclosure of the non-privileged material will be denied the opportunity to present evidence that is “material and

go[es] to the heart of their case such that no other documents can be substituted for those remaining in respondent's custody." See *Acevedo v. Doctors Hosp., Inc.*, 68 So. 3d 949, 951 (Fla. 3d DCA 2011)(certiorari granted because denial of *in camera* review was departure from essential requirements of law and irreparable harm demonstrated by showing information critical to case would not be known or available to appellate court for review otherwise). Here, **both** parties seek *in camera* review, but for different reasons. Edwards claims he has "nothing to hide" and seeks review to confirm this. Epstein believes these e-mails go to the heart of this case, his probable cause for bringing the original civil proceeding and continuing it, as well as and Edwards' absence of damages and complete lack of credibility.

Additional equitable considerations make *in camera* review even more appropriate. The Court has already recognized that some of the documents were detrimental to Edwards' counterclaim and beneficial to Epstein's defense of the same:

And I understand what you're going to tell me because I've gotten a flavor for some of these documents that have been provided. ... And that is that they are detrimental to the position taken by Mr. Edwards and that they are helpful to the position taken by Mr. Epstein.

(3/8/18, Aft. Tr. 51:23-52:5) (Excerpt **Exhibit J**). Without these 47 e-mails, Edwards will gain an unfair advantage in satisfying his heavy burden to establish the complete absence of probable cause for Epstein to have filed suit. Epstein will be denied his right to present crucial evidence that goes to the very heart of the reasons for Epstein's lawsuit against Edwards, as well as the veracity of Edwards' disingenuous claims that Epstein lacked probable cause to sue Edwards, and the false claim by Edwards that he was damaged as a result of this lawsuit. It will tilt the playing field heavily against Epstein, who is to be given the latitude afforded to all plaintiffs to use their best judgment in prosecuting a claim without the fear of a retaliatory lawsuit. The *in camera* review is

therefore necessary to confirm the relevance and admissibility of the 47 e-mails and ensure a fair trial.

The *Binger* issue previously raised by the Court as a potential basis to deny an *in camera* review is inapplicable here, where the e-mails were primarily authored or received by Edwards, and/or in Edwards' possession since 2009. Based on this, Edwards – an officer of the court, who took an oath to “never seek to mislead the judge or jury by any artifice or false statement of fact” - can certainly not claim “surprise.”¹¹

Only when *all* relevant facts regarding misconduct by Rothstein, Edwards and his co-counsel “are before the judge and jury can the ‘search for **truth and justice**’ be accomplished.” *Katzman v. Rediron Fabrication, Inc.*, 76 So. 3d 1060, 1063 (Fla. 4th DCA 2011); *Loureiro v. State*, 133 So. 3d 948, 956 (Fla. 4th DCA 2013)(“A trial must be a search for the truth.”). Here, the relevant facts exist in case-ending e-mails that go to the very heart of Epstein's probable cause, Edwards' lack of damages for Epstein's lawsuit against Edwards, and Edwards' credibility at issue in this action. Accordingly, this Court is equipped by the controlling law and equitable principles to perform the now substantially narrowed request for an *in camera* review of the sealed 47 e-mails, and to confirm the critically relevant nature of these e-mails and the absence or waiver of any attorney-client privilege or work-product protection for the same.

THE JURISDICTION OF THE BANKRUPTCY COURT
IS NOT AN ISSUE BEFORE THIS COURT

What is not before this Court and therefore not an issue upon which Edwards should be permitted to rely in seeking to prevent this Court's *in camera* review is the issue pertaining to the

¹¹*Oath of Admission to The Florida Bar*, <https://webprod.floridabar.org/wp-content/uploads/2017/04/oath-of-admission-to-the-florida-bar-ada.pdf>.

chain of custody and possession of the 47 e-mails before Link & Rockenbach appeared in this case.

At Edwards' election, upon motion filed by him, Farmer Jaffe, and the intervenors, that issue is now being addressed in the Bankruptcy Court.¹² The Bankruptcy Court will determine if there has been a violation of one of its orders and, if necessary, the appropriate relief. That review, however, has nothing to do with *this* Court's jurisdiction and duty to conduct an *in camera* inspection to determine the relevance, absence or waiver of attorney-client privilege and work-product protection, and admissibility with respect to the 47 e-mails. How the Fowler White firm obtained the disc from where the 47 e-mails originated is something which Edwards has decided that the Bankruptcy Court should sort out. Epstein agrees that the Bankruptcy Court is the proper forum for that inquiry. Clearly, neither the Fowler White firm nor Epstein ever used the alleged privileged documents, otherwise, this case would have ended long ago. Furthermore, it has already been established how Link & Rockenbach obtained the disc, and this Court found all of Link & Rockenbach's conduct once it discovered the information on the disc to be entirely proper.

CONCLUSION

Epstein, joined previously by Edwards, is simply asking the Court to review *in camera* the 47 e-mails to confirm that the attorney-client privilege is wholly inapplicable to all of them. As for work-product protection, to the extent that it ever applied to the 47 e-mails, this Court's *in camera* review will confirm that Edwards expressly waived it in February 2011 and he should be compelled to produce those documents now, or such documents should be deemed to have been produced by him. Epstein further asks this Court to conduct an *in camera* review of the 47 e-mails

¹² During the appellate stay, Edwards, on behalf of Farmer Jaffe, filed a Motion for Issuance of an Order to Show Cause in the Bankruptcy Court (*In re Rothstein Rosenfeldt Adler, P.A.*, U.S.D.C. S.D. Fla. Case No. 09-34791-RBR). [BR D.E. 6323.] (**Exhibit K**, w/o exs.) Edwards and the Intervenors then joined into that Motion, individually. [BR D.E. 6325 and 6345.] (**Exhibits L and M.**)

to confirm that they are relevant and admissible and that Epstein should be allowed to present the e-mails to the jury in order to ensure a fair trial of this matter.

Finally, Epstein requests that he be allowed to conduct limited discovery of Edwards and Farmer Jaffe to determine why former work product documents were not produced, contrary to the parties' agreement, and who authored the deceptive and misleading privilege log descriptions.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on April 4, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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**INDEX OF EXHIBITS TO EPSTEIN'S SUPPLEMENT TO MOTION
FOR COURT TO DECLARE RELEVANCE AND NON-PRIVILEGED
NATURE OF DOCUMENTS, ETC.**

Ex.	Date	Document
A	N/D	List of 47 e-mails identified on Epstein's 3/5/18 Clerk's Trial Exhibit List that Epstein seeks an <i>in camera</i> review of compared to Edwards' 2/23/11 Privilege Log
B	2/2/11	Email from Farmer Jaffe
C	2/9/11	Email from Farmer Jaffe
D	2/16/11	Transcript Excerpt of Meeting with Special Master
E	N/D	Docket Excerpt – <i>Jane Doe v. United States</i> , S.D. Fla. Case No. 9:08-CV-80736-KAM (CVRA Action)
F	5/7/12	Order on Epstein's Motion to Compel Production of Documents from Edwards and for Sanctions
G	8/17/12	Order on Outstanding Discovery Motions
H	2/23/11	Farmer Jaffe's Privilege Log
I	N/D	List of 85 e-mails Edwards produced in May 2012 that are contained on his Privilege Log and that Epstein identified on his November 2017 Exhibit List
J	3/8/18	Hearing Transcript – Afternoon Session Excerpts: pp. 1-2, 15, 51-52
K	3/19/18	Farmer Jaffe's Motion for Issuance of an Order to Show Cause Why Fowler White and Jeffrey Epstein Should Not Be Held in Contempt of Court, to Permit Discovery, to Assess Sanctions and Costs, and for Other Appropriate Relief (without exhibits) [BR D.E. 6323]
L	3/20/18	Bradley Edwards' Joinder in Motion for Issuance of an Order to Show Cause [BR D.E. 6325]
M	3/30/18	L.M., E.W. and Jane Doe's Joinder in Motion for Order to Show Cause and Motion for Discovery, to Assess Sanctions and Costs for Other Appropriate Relief [D.E. 6345]

EXHIBIT A

NOT A CERTIFIED COPY

EXHIBIT A

47 DOCUMENTS FROM EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST THAT EPSTEIN IS SEEKING AN *IN CAMERA* REVIEW OF COMPARED TO EDWARDS' PRIVILEGE LOG

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-1	4/9/09 3:50 p.m.	E-mail chain – from Bradley J. Edwards to Russell Adler (02645)	p. 123

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02633-02646	5/1/09	Paul Cassell	Bradley Edwards	Response to Motion to Consolidate + Cassell strategy Memo for Jay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-4	4/26/09 7:35 p.m.	E-mail chain - from Russell Adler to Bradley Edwards (00149)	p. 43

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
00149	4/26/09	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-5	4/27/09 2:16 p.m.	E-mail chain - from Bradley Edwards to Marc Nurik (01527)	p. 81

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01527	4/27/09	Marc Nurik	Bradley Edwards	New Victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-6	4/28/09 6:17 p.m.	E-mail chain – from Bradley Edwards to Katherine Ezell (4493-4495)	p. 22

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04491-04518	4/8/09	Bradley Edwards	Jack Scarola	Epstein- Tel. Conf.	Joint W/P Priv.

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-7	5/1/09 5:23 p.m.	E-mail chain - from Rob to Bradley Edwards (00014)	p. 32

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
00014	5/1/09	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-11	5/28/09 5:45 p.m.	E-mail chain – from William Berger to Bradley Edwards (00090)	p. 39

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
00090	5/28/09	Bradley Edwards	William Berger	Litigation Strategy	Work Product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-13	6/3/09 11:47 a.m.	E-mail chain – from Paul Cassell to Bradley Edwards (00133)	p. 42

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
00133	6/23/09	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-15	6/3/09 6:24 p.m.	E-mail chain - from Wayne Black to Bradley Edwards (08006)	p. 149

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08006-08011	6/3/09	Bradley Edwards	Wayne Black	Getting addresses for people for us to serve subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-17	7/13/09 2:13 p.m.	E-mail chain – from Paul Cassell to Bradley Edwards (00026)	p. 33

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
00025-00029	5/1/09	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-19	7/14/09 2:06 p.m.	E-mail chain – from Bradley Edwards to William Berger (01004)	p. 155

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01003-01005	10/12/09	Bradley Edwards	Paul Cassell	Asset movement by Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-25	8/3/09 11:17 a.m.	E-mail chain – from Beth to Carl Linder (12289)	p. 29

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
12281-12291	7/30/09	Carl Linder	Bradley Edwards	Litigation Strategy	Work product; attorney client privilege; irrelevant & [not] reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-30	8/11/09 9:26 p.m.	E-mail chain - from Marc Nurik to Scott Rothstein (26481)	p. 150

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26479-26481	8/19/09	Attorneys at RRA	Ken Jenne	Assistance on the Epstein Case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-34	8/13/09 4:51 p.m.	E-mail chain - from Marc Nurik to Scott Rothstein (26480)	p. 150

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26479-26481	8/19/09	Attorneys at RRA	Ken Jenne	Assistance on the Epstein Case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-35	8/13/09 5:31 p.m.	E-mail chain - from Russell Adler to Scott Rothstein (26356)	p. 86

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26356	8/13/09	Scott Rothstein	Russell Adler	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-36	8/13/09 6:02 p.m.	E-mail chain - from Marc Nurik to Scott Rothstein (26570)	p. 150

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26570	8/13/09	Scott Rothstein	Marc Nurik	Discussions about Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-44	9/4/09 6:59 p.m.	E-mail chain – from Bradley Edwards to Spencer Kuvin (03731-03732)	p. 17

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03719-03736	9/4/09	Bradley J. Edwards	Spencer Kuvin	CMA- depo notices attached.	Joint-privilege

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-45	9/10/09 9:48 a.m.	E-mail chain – from Bradley Edwards to redrum (06406-06408)	p. 46

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06404-06408	9/10/09	Bradley Edwards	Pat Diaz	NR Interview	Attorney/Client privilege and/or work product

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-46	9/11/09 6:06 p.m.	E-mail chain - from Bradley Edwards to Mike Fisten (01686)	p. 84

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01686	9/11/09	Mike Fisten	Bradley Edwards	Potential new witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-47	9/17/09 8:35 a.m.	E-mail chain – from Bradley Edwards to Dana Peterson (11123 – 11125)	p. 57

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11123-11136	9/17/09	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-49	9/19/09 7:54 a.m.	E-mail chain – from Bradley Edwards to Dana Peterson (11126-11127)	p. 57

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11123-11136	9/17/09	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-52	9/30/09 3:35 p.m.	E-mail chain - from Robin T. Kempner to All Staff (25925)	p. 46

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
25925	9/30/09	All Staff	Robin T. Kempner	Conflict check	Attorney/Client privilege and/or work product

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-53	9/30/09 3:51 p.m.	E-mail chain - from Robin T. Kempner to All Staff (25874)	p. 46

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
25874	9/30/09	All Staff	Robin T. Kempner	Additional name added to conflict check	Attorney/Client privilege and/or work product

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-56	10/5/09 7:16 a.m.	E-mail chain - from Bradley Edwards to William Berger (11145)	p. 114

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11143-11146	10/4/09	William Berger	Bradley Edwards	11/28 Discovery Cutoff	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-60	10/14/09 7:36 a.m.	E-mail chain – from Bradley Edwards to Paul Cassel (03191-03192)	p. 95

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03191-03196	10/14/09	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-66	10/17/09 1:00 p.m.	E-mail chain – from Bradley Edwards to Paul Cassell (04398-04402)	p. 64

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04387-04402	8/19/09	Paul Cassell	Bradley Edwards	Victim Complaints, Forensic accountants, & Epstein's Fraudulent Transfers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-67	10/17/09 1:58 p.m.	E-mail chain – from Bradley Edwards to Paul Cassell (04408-04412)	p. 64

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04403-04416	10/17/09	Paul Cassell	Bradley Edwards	Punitive Damages	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-86	10/23/09 11:37 a.m.	E-mail chain – from Matthew Weissing to Mark Fistos, Russell Adler, Bradley Edwards, Scott Rothstein and Steven Jaffe (26747)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-88	10/23/09 12:11 p.m.	E-mail chain – from Matthew Weissing to Mark Fistos and Bradley Edwards (08042-08044)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08033-08070	10/23/09	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-89	10/23/09 12:12 p.m.	E-mail chain – from Bradley J. Edwards to Scott Rothstein, Steven Jaffe and Mark Fistos (26741-26742)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-90	10/23/09 12:16 p.m.	E-mail chain – from Bradley Edwards to Matthew Weissing (08059-08061)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08033-08070	10/23/09	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-93	10/23/09 12:27 p.m.	E-mail chain – from Bradley Edwards to Scott Rothstein, Steven Jaffe and Mark Fistos (26756-26758)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-94	10/23/09 12:36 p.m.	E-mail chain – from Bradley Edwards to Mark Fistos (08036-08038)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08033-08070	10/23/09	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-97	10/23/09 1:26 p.m.	E-mail chain – Bradley J. Edwards to Russell Adler, Scott Rothstein and Mark Fistos (26762)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-98	10/23/09 1:31 p.m.	E-mail chain – from Matthew Weissing to Bradley Edwards, Russell Adler, Mark Fistos and Steven Jaffe (01117)	p. 77

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01112-01117	5/12/09	Bradley Edwards	William Berger	Dr. Swan	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-100	10/23/09 1:59 p.m.	E-mail chain – from Mark Fistos to Bradley Edwards and Russell Adler (08121-08123)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08118-08123	10/23/09	Attorneys at RRA	Russell Adler	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-101	10/23/09 2:02 p.m.	E-mail chain – from Scott Rothstein to Bradley Edwards, Steven Jaffe and Mark Fistos (26749-26752)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-102	10/23/09 2:05 p.m.	E-mail chain – from Mark Fistos to Bradley Edwards and Russell Adler (08128-08130)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08124-08156	10/23/09	Attorneys at RRA	Steven Jaffe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-103	10/23/09 2:06 p.m.	E-mail chain – from Russell Adler to Bradley Edwards and Mark Fistos (08118-08120)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08118-08123	10/23/09	Attorneys at RRA	Russell Adler	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-104	10/23/09 2:09 p.m.	E-mail chain – from Mark Fistos to Bradley Edwards and Russell Adler (08131-08133)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08124-08156	10/23/09	Attorneys at RRA	Steven Jaffe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-105	10/23/09 2:09 p.m.	E-mail chain – from Steven Jaffe to Bradley Edwards, Mark Fistos and Russell Adler (08124-08126)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08124-08156	10/23/09	Attorneys at RRA	Steven Jaffe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-106	10/23/09 2:10 p.m.	E-mail chain – from Matthew Weissing to Bradley Edwards, Mark Fistos and Russell Adler (08135-08138)	p. 101

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
08124-08156	10/23/09	Attorneys at RRA	Steven Jaffe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-107	10/23/09 2:24 p.m.	E-mail chain – from Mark Fistos to Steve Jaffe, Scott Rothstein, Russell Adler, Bradley Edwards and Matthew Weissing (27494)	p. 74

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
27494	10/23/09	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-108	10/23/09 2:45 p.m.	E-mail chain – from Mark Fistos to Steven Jaffe, Scott Rothstein, Russell Adler, Bradley Edwards and Matthew Weissing (26760)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26741-26763	10/23/09	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-110	10/23/09 3:43 p.m.	E-mail chain – from Russell Adler to Scott Rothstein (25997)	p. 73

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
25997	10/23/09	Scott Rothstein	Russell Adler	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-111	10/25/09 3:21 p.m.	E-mail chain – from Ken Jenne to Scott Rothstein (25937)	p. 67

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
25937	10/25/09	Scott Rothstein	Ken Jenne	Epstein's house staff	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-113	10/27/09 5:23 p.m.	E-mail chain – from Ken Jenne to Phaedra Xanthos (26604-26605)	p. 150

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
26604-26605	10/27/09	Phaedra Xanthos	Ken Jenne	Political Contributions/advertisement for the rental on Little St. James Island	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

EPSTEIN'S MARCH 5, 2018, CLERK'S TRIAL EXHIBIT LIST			
No.	Date	Document	Privilege Log
13-116	10/29/09 7:44 p.m.	E-mail chain – from Paul Cassell to Bradley Edwards (07019-07021)	p. 129

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07019-07024	10/29/09	Bradley Edwards	Paul Cassell	L.M. and E.W. v. Epstein – I'm on it	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights.

EXHIBIT B

NOT A CERTIFIED COPY

Joseph L. Ackerman, Jr.

From: Gary Farmer <gary@pathtojustice.com>
Sent: Wednesday, February 02, 2011 1:49 PM
To: ROBERT CARNEY; Jack Scarola; Seth Lehrman; Lilly Ann Sanchez; Joseph L. Ackerman, Jr.; Brad Edwards
Subject: RE: It's time to meet

Judge, I apologize for the delay in replying, I was out of the office most of the day yesterday, and could not get with my partners and our clients to discuss all issues. We have now done so. We are certainly happy to meet, but maybe a conference call can accomplish the same thing. But even before that, let me lay out a proposal that I think should be acceptable to all parties. Here is what we propose...and it essentially includes the "aye, aye" you requested, with some additional provisions.

We will agree to prepare a revised log in which we add dates for the emails and a description of the subject matter & parties. But we will also omit from the log any work product privilege objections, subject to the following agreement. (All work product materials will be turned over to Plaintiff except for materials related to new or ongoing cases, AND on the condition that they be produced "For Attorneys' Eyes Only" such that no copies or images will be made of them, and Epstein will not see these documents, unless and until such time as Judge Crow and/or Judge Ray has overruled any privilege claim (following your recommended report, or course). If the objections are sustained, the documents will be returned to us and no copies retained by Plaintiff's attorneys; if the objections are overruled and the documents otherwise deemed discoverable, Plaintiff gets them. The Plaintiff and his attorneys will also agree that by entering into this agreement and producing these documents as described, Plaintiff will not take the position that we have waived any privilege. (Thus, the only items Your Honor will have to review and make privilege determinations would be as to work product materials for existing cases, and attorney/client privilege materials.

We should note at this point that many of the objections we have raised in the log are in fact relevancy objections. We were forced to do so to also protect privacy rights of those not a part of this case. This is due in large part to the extremely broad scope of documents produced by the Trustee. Many of these emails involve very personal matters or highly personal issues involving staff at RRA with no possible relevance to the case. We can eliminate them from the log, and argue relevance issues to Judge Crow, which will speed things up, but only if the Plaintiff will agree to a confidentiality order to protect privacy rights. We simply cannot waive the privacy of these people, and we had no idea that such items would be included in the Trustee's production when we previously appeared before Judge Ray. If the Plaintiff feels that such a document is relevant to his case he can seek relief from the confidentiality order.

Regarding Judge Crow, given his ruling this week in which he clearly indicated that while he will not interfere with Judge Ray but that he (Judge Crow) will be the sole and final arbiter of discovery in the case before him, including issues of privilege and relevance, we believe it prudent to enter an agreed order appointing Judge Carney as special master in the state case, too. That way this whole process need not be repeated by another master, and no further time is wasted.

We believe we can get the revised and limited privilege log (limited to only attorney/client privilege matters, as our clients will not waive same and will not agree to the attorneys' eyes only limitation) within 7-10 days. But that should not slow the process at all at this point, since Judge Carney still needs to review all the remaining privilege claims and that will take significant time. While we are preparing the revised log, Judge

Carney can begin his review of the privileged documents. We will then produce the revised log and the Plaintiff's counsel can then raise any objections they have, and we can have one hearing before Judge Carney on all issues before he enters his recommended order to Judge Ray.

Finally, with regard to your review Judge, we think that it will be an extreme inconvenience to our firm to have to sit with you for a week or even a few days while you conduct the in camera inspection. Instead, we propose that we submit a list to you in which we identify as many people as possible whose identities or connection to the privilege claims may not be apparent, to aid you in your review. We can make ourselves available by phone if someone else comes up, or for other questions. Alternatively, you could put questioned items in a pile and then call both sides in for any questions you have about that pile. This would greatly reduce the amount of time the attorneys have to spend sitting around while Your Honor conducts the review. While Plaintiff's counsel is being paid by the hour in this case, we are not and we can put the time spent sitting while Your Honor reviews to much more productive use. Moreover, if Plaintiff agrees to the proposal above for work product, the universe of documents in which Your Honor needs guidance should be significantly reduced.

I truly believe this to be a fair compromise that allows the process to proceed while we revise the log, and preserves all arguments for both sides. Please advise if this is acceptable. Thank you.

Gary M. Farmer, Jr., Esq.

Civil Justice Attorney

Farmer, Jaffe, Weissing,

Edwards, Fistos & Lehrman, P.L.

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From: ROBERT CARNEY [mailto:rbcarney3@gmail.com]

Sent: Tuesday, February 01, 2011 7:54 AM

To: Gary Farmer; Jack Scarola; Seth Lehrman; Lilly Ann Sanchez; Joseph L. Ackerman Jr.; Brad Edwards

Subject: It's time to meet

Now that Judge Crow has ruled, it is time to get down to business. According to Judge Ray's Order, the privilege log was due by the 31st, and we now have thirty days. We can debate whether the current log is in compliance with the rules or not, but the fact remains, in its present format there is no way that the Plaintiff can cull thru the list and eliminate those documents for which it has no interest. This creates a problem.

Unfortunately, it is far more of an attorney problem than it is a Special Master problem. I need both sides

present when I make my inspection because I am going to have to have input on who is who. Because the log cannot first be culled by the Plaintiff in its present form, this is going to be a laborious and very time consuming process, so we need to block off appropriate time now. I don't think that a full week is out of line. Judge Ray's Order gives this phase one month.

I see this playing out as follows:

1. 1. Review of documents where privilege is claimed to see if there is any facial reason for that claim. This means both sides being present as I go thru all 17,000 documents. Many documents are sent to third parties. Whether this waives the privilege depends on who the third party is and how he or she fits into the case. Where there is no privilege, the documents would be earmarked for release to the Plaintiff. The Plaintiff, as recently as one of Joe's last emails, continues under the belief that I am assisting the Defendant in preparing the log. I am not. I am the neutral Master ruling on log. As such, I am not going to work with the Defendant on this. Both sides are present or neither side is present during the review.
2. 2. After that process, for those documents where there legitimately is a privilege, an evidentiary hearing would be conducted to see if the privilege has been abrogated in any way.
3. 3. Preparation of a Special Master Report to Judge Ray outlining my findings.

Had the Defendant prepared a log in compliance with Tig, we might have been able to shorten this process. Whether there has been an appropriate privilege log and what sanction, if any, should be imposed if there has not, can be addressed as we proceed, but we are under a one month time limitation as of now. We need to meet or conference not later than Wednesday as I indicated in my last email. If anyone has a better idea on how to proceed, I am all ears, but I am not looking to extend the Order. We have one month, and in the absence of complete agreement by both sides, I am not waiving the requirement that both sides be present as I review the documents.

EXHIBIT C

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Joseph L. Ackerman, Jr.

From: Gary Farmer <gary@pathtojustice.com>
Sent: Wednesday, February 09, 2011 4:27 PM
To: ROBERT CARNEY; Joseph L. Ackerman, Jr.; Lilly Ann Sanchez; Jack Scarola; CHRISTOPHER E. KNIGHT; Seth Lehrman; Brad Edwards
Subject: RE: Suggestion

Hello all. I wanted to provide an update, and get written confirmation from the Plaintiff's counsel of the deal that was verbally agreed to on Friday and put into an email by me on Monday. I have not received any reply to my Monday email. I will resend it after this.

But by way of update I can tell you that we have four (4) boxes of documents that are ready to be turned over now (or when we get them back from a copy center that is scanning them) under the agreement. To be specific, we have 2 boxes of documents that contain materials that we believe to be irrelevant but that implicate privacy rights of the parties or non-parties (mostly staff at the old RRA). These will be turned over subject to a confidentiality order (and that needs to be drafted, BTW), such that Plaintiff & his counsel can immediately begin reviewing same. (We also have 2 more boxes that contain work product materials that we will turn over subject to the agreement that Plaintiff will not assert that any privilege has been waived by turning them over now, and further subject to the agreement that they be produced "For Attorneys' Eyes Only.") Should Plaintiff or his attorneys believe that a document is not confidential or privileged, that objection will be brought before Judge Carney and he will issue a recommended order to both Judges Crow and Ray.


We have also completed what I would estimate to be 1/5 of the revised privilege log, and are prepared to make those documents available immediately for Judge Carney to begin reviewing, and we will produce that portion of the privilege log to Plaintiff as well. We estimate that the privilege log will be completed by Tuesday, perhaps earlier, but are also agreeable to a rolling production of revised log to Plaintiff and documents for review by Judge Carney, subject to the agreement.

Judge, I know that you are anxious to begin the review, and I have spoken with Brad and he just had a trial in which he was supposed to start Monday get continued. As such, he would be available to sit with you and go through the privileged items this coming Monday & Tuesday here in our office. In fact, as the log progresses we will have a constant flow of documents for you & he to review, such that you may be able to finish the review next week.

We are attempting to move this forward as quickly as possible, and once we get written confirmation of the Agreement and draft the Confidentiality Order, Plaintiff can have at review of the 4 boxes immediately. I would also remind everyone that these 4 boxes are in addition to the 3 boxes of over 8,000 documents already produced for which our objection was withdrawn.

Thanks. Gary

Gary M. Farmer, Jr., Esq.
Civil Justice Attorney
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Edwards, Fistos & Lehrman, P.L.**
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From: ROBERT CARNEY [mailto:rbcarney3@gmail.com]

Sent: Friday, February 04, 2011 4:31 PM

To: Joseph L. Ackerman Jr.; Lilly Ann Sanchez; Jack Scarola; CHRISTOPHER E. KNIGHT; Gary Farmer; Seth Lehrman; Brad Edwards

Subject: Suggestion

I have another suggestion for you all to ponder over the weekend. I am assuming by now that all have read Judge Crow's Order. Translated into plain English, he is saying 'I don't care what you all do in bankruptcy court. I am only bound by it if I agree with it.' This puts everyone in a precarious position. Epstein's rights only come from his state court subpoena, and what he puts in evidence in state court is controlled by Judge Crow, not by Judge Ray. Remember, Judge Ray has no interest in the outcome of the state court litigation, no interest in what gets put into evidence in state court, and no interest in whether Epstein gets to look at the documents. He is only looking to protect the trustee.

We can be wasting a huge amount of time and money if the state court does not like what Judge Ray does. And the Plaintiff is not really going to be able to circumvent an adverse order by Judge Crow by waiving Judge Ray's Order at him.

So here is my suggestion. I have made this before and will do it again. Both sides request a stay from Judge Ray with a request to let Judge Crow rule on this. It is, after all, Judge Crow's case, and it is state rules and state law that applies. And Epstein only gets into evidence what Judge Crow says he can put in evidence. If Judge Ray agrees with transferring the Special Master status to state court and Judge Crow approves, the Report would go to Judge Crow, and he could sign off on it nor not. Objections to the report, if any, would be heard by Judge Crow and not Judge Ray. Since Judge Crow is the final arbiter, I can't see any reason not to let him decide in the first place. The very real potential of conflicting orders is eliminated as is the potential for duplication of time and effort with two different judges on the same issue.

I have said all along that this is a state court issue, and it is clear now that Judge Crow agrees with that. So let it be resolved by the state court.

I challenge either side to show any downside to this suggestion. And I challenge either side to show why there isn't a huge downside in terms of time, money, and the potential of conflicting orders by continuing as we are.

Both sides would have to agree, but in light of Judge Crow's Order, I cannot see any reason why both sides are not already suggesting this.

EXHIBIT D

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MEETING HELD BEFORE SPECIAL MASTER ROBERT CARNEY

IN RE:

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA

Complex Litigation, Fla. R. Civ. Pro. 1201

CASE NO. 50 2009CA040800XXXXMB AG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendants.

DATE TAKEN: Wednesday, February 16, 2011
TIME: 10:05 AM - 11:15 AM
PLACE: SEARCY DENNEY SCAROLA BARNHART & SHIPLEY
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409

Lee Lynott, Registered Merit Reporter
Registered Professional Reporter
Certified Shorthand Reporter
Hi-Tech/United Reporting, Inc.
1218 SE 3rd Avenue
Fort Lauderdale, FL 33316

1 to -- Let me see if we can cut quickly to the chase
2 here.

3 The confidentiality, can we get the confidentiality
4 worked out so that we get something in writing so
5 everyone is happy, in writing by next Friday at the
6 latest?

7 MR. ACKERMAN: That will be fine.

8 MR. FARMER: How about this Friday?

9 MRS. SANCHEZ: The documents are ready to go. Write
10 up whatever you want and we'll -- we don't have a
11 problem with that.

12 MR. FARMER: You guys have to have 19,000
13 confidentiality orders done in other cases and you get
14 paid by the hour to do this.

15 MRS. SANCHEZ: I don't have a problem, but we will
16 get an order to you by tomorrow and you can get the
17 documents to us by Friday, and that's done.

18 MR. FARMER: (Do you still want to do the
19 attorney's-eyes only?) (Do you want to speed it up or
20 not?) (You'll get work-product stuff if you agree to the
21 attorney's-eyes only.)

22 MRS. SANCHEZ: Yes.

23 MR. KNIGHT: We need to get the ball rolling.

24 MR. ACKERMAN: Let's do that.

25 MRS. SANCHEZ: Yes.

EXHIBIT E

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REF_SETTLEMENT,WM

**U.S. District Court
Southern District of Florida (West Palm Beach)
CIVIL DOCKET FOR CASE #: 9:08-cv-80736-KAM**

Doe v. United States of America
Assigned to: Judge Kenneth A. Marra
Referred to: Magistrate Judge Dave Lee Brannon
(Settlement)
Case in other court: USCA, 13-12923-C
USCA, 13-12926-C
USCA, 13-12928-C
Cause: no cause specified

Date Filed: 07/07/2008
Jury Demand: None
Nature of Suit: 440 Civil Rights: Other
Jurisdiction: U.S. Government
Defendant

Petitioner**Jane Doe**

represented by **Bradley James Edwards**
Farmer Jaffe Weissing Edwards Fistos
& Lehrman PL
425 N Andrews Avenue
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Fax: 954-524-2822
Email: brad@pathtojustice.com
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ATTORNEY TO BE NOTICED

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Paul G. Cassell
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PRO HAC VICE
ATTORNEY TO BE NOTICED

V.

Respondent**United States of America**

represented by

		Clerks Notice of Docket Correction and Instruction to Filer re <u>30</u> Response/Reply (Other), Response/Reply (Other) filed by Jane Doe. Error - Wrong Event Selected ; Correction - Redocketed by Clerk as Reply to Response to Motion. Instruction to Filer - In the future, please select the proper event. It is not necessary to refile this document. (ls) (Entered: 10/17/2008)
12/05/2008	<u>33</u>	Sealed Document. (rb) (Entered: 12/05/2008)
12/05/2008		SYSTEM ENTRY - Docket Entry 32 restricted/sealed until further notice. (dj) (Entered: 11/03/2010)
12/09/2008	<u>34</u>	Clerks Notice of Docket Correction re <u>33</u> Sealed Document. Error(s): Sealed Document Filed in Wrong Case; Correction - Original document restricted and refiled in correct case. (rb) (Entered: 12/09/2008)
12/22/2008	<u>35</u>	AFFIDAVIT signed by : A. Marie Villafana. re <u>14</u> Affidavit, <u>13</u> Response/Reply (Other) <i>Supplemental Declaration</i> by United States of America. (Attachments: # <u>1</u> Certification Certificate of Service)(Villafana, Ann Marie) (Entered: 12/22/2008)
02/12/2009	<u>36</u>	ORDER denying <u>28</u> Motion to Unseal Document. Signed by Judge Kenneth A. Marra on 2/12/2009. (ir) (Entered: 02/12/2009)
<u>(04/09/2009)</u>	<u>(37)</u>	<u>NOTICE by Jane Doe of Change of Firm Affiliation (Edwards, Bradley)</u> (Entered: 04/09/2009)
09/08/2010	<u>38</u>	Administrative Order Closing Case. Signed by Judge Kenneth A. Marra on 9/8/2010. (tb) (Entered: 09/09/2010)
<u>(09/13/2010)</u>	<u>(39)</u>	<u>NOTICE by Jane Doe re 38 Administrative Order In Response to Administrative Order Closing Case (Edwards, Bradley)</u> (Entered: 09/13/2010)
10/12/2010	<u>40</u>	ORDER TO SHOW CAUSE for lack of prosecution. Show Cause Response due by 10/27/2010. Signed by Judge Kenneth A. Marra on 10/8/2010. (ir) (Entered: 10/12/2010)
10/27/2010	<u>41</u>	STATUS REPORT by Jane Doe (Edwards, Bradley) Modified to add missing event 42 Response to Order to Show Cause on 10/28/2010 (ls). (Entered: 10/27/2010)
10/27/2010	<u>42</u>	RESPONSE TO ORDER TO SHOW CAUSE by Jane Doe. (ls)(See Image at DE # <u>41</u>) (Entered: 10/28/2010)
10/28/2010	<u>43</u>	Clerks Notice to Filer re <u>41</u> Status Report. Two or More Document Events Filed as One ; ERROR - Only one event was selected by the Filer but more than one event was applicable to the document filed. The docket entry was corrected by the Clerk. It is not necessary to refile this document but in the future, the Filer must select all applicable events. (ls) (Entered: 10/28/2010)
10/28/2010	<u>44</u>	ORDER REOPENING CASE. Signed by Judge Kenneth A. Marra on 10/28/2010. (ir) (Entered: 10/28/2010)
12/17/2010	<u>45</u>	STATUS REPORT by United States of America (Villafana, Ann Marie) (Entered: 12/17/2010)

EXHIBIT F

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiffs.

**ORDER ON PLAINTIFF JEFFREY EPSTEIN'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM
DEFENDANT BRADLEY EDWARDS AND FOR SANCTIONS**

THIS MATTER came before the Court on Plaintiff Jeffrey Epstein's Motion to Compel Production of Documents from Defendant Bradley Edwards and for Sanctions in the above-styled case. This Court having reviewed the Motion, having heard argument of counsel, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED as follows:

*The Defendant
Bradley Edwards shall within 30
days of the date of this order file
a more complete privilege log. The Court
finds the privilege log is insufficient on its
face and does not comply with the requirements
of F.R.C.P. 1.280(b)(5) and TIG Ins. Corp v.
Johnson, 799 So2d 339 (Fla 4th DCA 2001). In*

FILED
2012 MAY -8 PM 4:02
JIM R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 5

Epstein v. Rothstein and Edwards
Case No. 502009CA040800XXXXMB/Division AG
Order on Epstein's Motion to Compel and for Sanctions
Page 2 of 2

all other respects the Motion is denied at this time

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida

this 1st day of April, 2012.

may


HONORABLE DAVID F. CROW
CIRCUIT JUDGE

Copies furnished to:

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Fort Lauderdale, FL 33301

EXHIBIT G

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

FILED
2012 AUG 17 PM 3:41
STANLEY R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL

ORDER ON OUTSTANDING DISCOVERY MOTIONS

THIS CAUSE having come to be considered on August 3, 2012, on outstanding discovery motions, and the Court having reviewed the file and being fully advised in the premises, it is hereby,

ORDERED and ADJUDGED that EDWARDS' Motion for Clarification is GRANTED, and this Court's Order of May 7, 2012 is vacated without prejudice. EDWARDS shall file a written response specifically addressing the production sought in Paragraph 13 of EPSTEIN's Motion to Compel and Amend Protective Order of March 9, 2012 as Ordered in this Court's April 10, 2012 Order. The response shall identify non-privileged responsive documents previously produced, shall be accompanied by all non-privileged responsive documents not previously produced, if any, and shall identify, in a proper privilege log as referenced in this Court's May 7, 2012 Order, responsive documents withheld from production on the basis of any assertion of privilege. This response shall be filed within 10 days from the date of this Order.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Order on Outstanding Discovery Motions

DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, this 17th
day of Aug, 2012.



DAVID F. CROW
CIRCUIT JUDGE

Copies have been furnished to all counsel on the attached counsel list.

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Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Order on Outstanding Discovery Motions

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EXHIBIT H

NOT A CERTIFIED COPY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.
_____ /

PRIVILEGE LOG
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN

Dated: February 23, 2011

Total of 159 pages

EXHIBIT Q

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
08076-08089	08/04/2009	Bradley Edwards	Spencer Kuvin	Transcript of Alfredo Rodriguez Deposition	Joint W/P Priv.
08311-08318	05/26/2009	Bradley Edwards	Katherine Ezell	WPB-Confidential-General-Financial Disclosure/Discovery	Joint W/P Priv.
08319-08324	10/16/2009	Bradley Edwards	Amy Ederi	WPB-General-Confidential	Joint W/P Priv.
08398	09/01/2009	Bradley Edwards	Kikka Claudio	C.M.A. vs. Epstein, et al.(File#:281849)	Joint W/P Priv.
08402	09/17/2009	Bradley Edwards	Paul Cassell	Report this as a parole violation	Joint W/P Priv.
08415	09/16/2009	Bradley Edwards	Margaret Berk	Scanned document from Margaret Berk	Joint W/P Priv.
08422	08/11/2009	Bradley Edwards	Katherine Ezell	Subpoena directed to the investigators	Joint W/P Priv.
10060	08/03/2009	Adam Horowitz	Jacquie Johnson	Epstein-Depo-New York	Joint W/P Priv.
10069-10074	08/04/2009	Bradley Edwards	Spencer Kuvin	RE:Transcript of Alfredo Rodriguez Deposition	Joint W/P Priv.
10077-10079	08/06/2009	Bradley Edwards	Mercedes Estrada	RE:Epstein vs. Jane Doe No.101 & Epstein vs. Jane doe No. 102	Joint W/P Priv.
10099-10102	08/27/2009	Bradley Edwards	Spencer Kuvin	RE: Epstein Depo	Joint W/P Priv.
10192	08/11/2009	Adam Horowitz	Jacquie Johnson	Trump Depo moved 08/18 to 9/24 in NY	Joint W/P Priv.
10194-10195	08/11/2009	Jacquie Johnson	Kikka Claudio	FW: Out of state subpoenas	Joint W/P Priv.
10264-10266	08/09/2009	Adam Horowitz	Jacquie Johnson	RE:Epstein-Letter regarding Leslie Wexner	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
10279-10291	08/10/2009	Adam Horowitz	Jacquie Johnson	RE: Epstein-Notice of production from non parties/depo of Jane Doe	Joint W/P Priv.
10372-10373	09/17/2009	Bradley Edwards	Katherine Ezell	RE: Leslie Wexner	Joint W/P Priv.
10490-10493	09/21/2009	Bradley Edwards	Amy Ederi	FW: Epstein Depo	Joint W/P Priv.
10592-10593	09/29/2009	Bradley Edwards	Katherine Ezell	RE: Leslie Wexner	Joint W/P Priv.
10604-10620	10/01/2009	Bradley Edwards	Katherine Ezell	FW:meeting w/ atty fr wexner	Joint W/P Priv.
10639-10643	10/06/2009	Bradley Edwards	Stuart Mermelstein	Meeting w/Leslie Wexner	Joint W/P Priv.
10700-10702	10/13/2009	Adam Horowitz	Jacquie Johnson	Depo	Joint W/P Priv.
10724-1073	10/14/2009	Adam Horowitz	Jacquie Johnson	Epstein-depo of Alan Dershowitz	Joint W/P Priv.
10897	10/29/2009	Bradley Edwards	Stuart Mermelstein	Leslie Wexner	Joint W/P Priv.
10992-11005	06/22/2009	Bradley Edwards	Amy Ederi	RE:Regular Monthly Cong. Call	Joint W/P Priv.
11011-11021	06/23/2009	Bradley Edwards	Katherine Ezell	RE:Regular Monthly Cong. Call	Joint W/P Priv.
11026-11032	07/09/2009	Bradley Edwards	Spencer Kuvn	RE:Epstein commissioner appointees	Joint W/P Priv.
11072-11074	07/28/2009	Bradley Edwards	Katherine Ezell	Possible witness from Switzerland	Joint W/P Priv.
11166-11169	06/23/2009	Katherine Ezell	Bradley Edwards	RE:Article: Bear Stearns	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
11240-11245	06/22/2009	Katherine Ezell	Bradley Edwards	Article: Bear Stearns	Joint W/P Priv.
11248-11250	06/22/2009	Amy Ederi	Bradley Edwards	Article: Bear Stearns	Joint W/P Priv.
11255-11259	06/23/2009	Katherine Ezell	Bradley Edwards	USAO Chose Bradley Edwards conversation	Joint W/P Priv.
11269-11281	06/30/2009	Stuart Mermelstein	Bradley Edwards	RE: Epstein Depo; possible deponents	Joint W/P Priv.
11316-11319	06/28/2009	Katherine Ezell	Bradley Edwards	Discussion about possible witness from Switzerland	Joint W/P Priv.
11332-11336	08/04/2009	Spencer Kuvin	Bradley Edwards	FW: Transcript of Alfredo Rodriguez Depo and Copperfeild and Clinton's whereabouts	Joint W/P Priv.
11340-11341	08/05/2009	Mercedes Estrada	Bradley Edwards	RE: Epstein vs. Jane Doe No. 101 & 102	Joint W/P Priv.
11348-11358	08/06/2009	Adam Horowitz	Bradley Edwards	RE: Motion for protective order/discussion	Joint W/P Priv.
11430-11434	08/27/2009	Spencer Kuvin	Bradley Edwards	Discussion RE: Wexner involvement	Joint W/P Priv.
11443	09/17/2009	Katherine Ezell	Bradley Edwards	Wexner served subpoena OH	Joint W/P Priv.
11541-11542	09/29/2009	Katherine Ezell	Bradley Edwards	RE: Leslie Wexner & Bob	Joint W/P Priv.
11551-11559	10/01/2009	Spencer Kuvin	Bradley Edwards	RE: Meeting w. Stanely Arkin	Joint W/P Priv.
11585-11586	10/14/2009	Adam Horowitz	Bradley Edwards	RE: Epstein; Larry Visoski confirmed	Joint W/P Priv.
11675-11676	10/29/2009	Stuart Mermelstein	Bradley Edwards	RE: Leslie Wexner attorney info	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15981-15988	08/04/2009	Spencer Kuvin	Jacque Johnson	Attachment:Kellen & Trump subpoena	Joint W/P Priv.
15999-16007	08/05/2009	Bert Patton	Jacque Johnson	RE:Epstein Depo-New York	Joint W/P Priv.
16057-16065	08/06/2009	Mercedes Estrada	Jacque Johnson	Trump and Maxwell Dep dates	Joint W/P Priv.
15918-15949	08/04/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo's 08/14,17,18 in NY & OH	Joint W/P Priv.
16066-16069	08/06/2009	Adam Horowitz	Jacque Johnson	Maxwell,Trump, Wexner convo RE:Depo dates	Joint W/P Priv.
16095-16098	08/11/2009	Adam Horowitz	Jacque Johnson	Maxwell,Trumo,Wexner Convo RE:Depo dates cont..	Joint W/P Priv.
15813-15814	10/29/2009	Stuart Mermelstein	Bradley Edwards	Wexler Lawyer's info	Joint W/P Priv.
15856	08/03/2009	Adam Horowitz	Jacque Johnson	Epstein Depo-NY;2 Attachments	Joint W/P Priv.
15866-15881	08/03/2009	Adam Horowitz	Jacque Johnson	Epstein Depos 08/14,17,18 in NY&OH/PDF of Sarah Kellen Notice of Videotaped Depo	Joint W/P Priv.
15893-15901	08/03/2009	Kikka Claudio	Jacque Johnson	Depo &subpoena notice for Trump	Joint W/P Priv.
15360-15363	09/01/2009	Jacque Johnson	Mercedes Estrada	RE:Alan Dershowitz;Harvard Law Info	Joint W/P Priv.
15394-15397	09/09/2009	Jacque Johnson	Katherine Ezell	RE:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
15413-15428	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Esptein-Notice of Prodcution from Non Parties	Joint W/P Priv.
15434-15437	09/10/2009	Jacque Johnson	Katherine Ezell	Notice Of Production from Non-Parties discussion	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15454-15475	09/15/2009	Adam Horowitz	Jacque Johnson	Critton's notice of depo; Epstein notice of hearing, Mark Epstein notice of depo	Joint W/P Priv.
01465	07/13/2009	Katherine Ezell	Bradley Edwards	Epstein	Joint W/P Priv.
15485-15492	09/17/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein Depo	Joint W/P Priv.
15493-15500	09/18/2009	Jacque Johnson	Katherine Ezell	RE: Deposition of Jean Luc Bruhnel	Joint W/P Priv.
15501-15555	09/18/2009	Jacque Johnson	Adam Horowitz	RE: Epstein Depo	Joint W/P Priv.
15556-15564	09/22/2009	Jacque Johnson	Margaret Berk	Epstein Depos	Joint W/P Priv.
15565-15575	09/25/2009	Jacque Johnson	Lisa Rivera	FW: Deposition of Jean Luc Bruhnel	Joint W/P Priv.
15687-15688	10/01/2009	Jacque Johnson	Lisa Rivera	Depo of David Hart Rogers	Joint W/P Priv.
15692-15707	10/01/2009	Jacque Johnson	Katherine Ezell	FW: Meeting w/ Sranley Arkin	Joint W/P Priv.
15708-15709	10/06/2009	Jacque Johnson	Mercedes Estrada	RE: Jane Does 2-8v. Epstein-Cross Nod's of Oct 6-8 depositions	Joint W/P Priv.
15033-15032	08/05/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein-Depo for 8/17	Joint W/P Priv.
15087-15093	08/06/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein-Depo for 8/17	Joint W/P Priv.
15094-15100	08/06/2009	Jacque Johnson	Kikka Claudio	RE: Epstein Depo-New York	Joint W/P Priv.
15109-15112	08/10/2009	Jacque Johnson	Adam Horowitz	RE: Epstein Depositions for 8/14, 17, 18 in NY & OH	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15122-15125	08/11/2009	Jacque Johnson	Kikka Claudio	RE: Ms. Maxwell Depo rescheduled	Joint W/P Priv.
15142-15158	08/11/2009	Bradley Edwards	Kikka Claudio	FW:out of state subpoenas	Joint W/P Priv.
15166-15170	08/11/2009	Jacque Johnson	Kikka Claudio	RE:out of state subpoenas	Joint W/P Priv.
15171-15172	08/11/2009	Jacque Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15178-15182	08/12/2009	Jacque Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15306-15355	08/25/2009	Jacque Johnson	Kikka Claudio	FW:Epstein Depo Notices & Subs	Joint W/P Priv.
14951-14952	08/03/2009	Jacque Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14954-14972	09/16/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Depo of Mark Epstein on 9/21 in NY will take place as scheduled	Joint W/P Priv.
14979-14981	08/03/2009	Jacque Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14983-15015	08/04/2009	Jacque Johnson	Adam Horowitz	RE:Epstein Depositions 8/14,17, &18 in NY & OH	Joint W/P Priv.
16501-16519	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
16520-16547	09/09/2009	Spencer Kuvin	Jacque Johnson	RE:Epstein-Deposition of Jane Doe-9/30/2009	Joint W/P Priv.
16355-16384	08/24/2009	Adam Horowitz	Jacque Johnson	Epstein Depo Notices and Subs	Joint W/P Priv.
16554-16568	09/16/2009	Kikka Claudio	Jacque Johnson	RE:Epstein Depo	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16574-16577	09/17/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo	Joint W/P Priv.
16396-16398	09/01/2009	Margaret Estrada	Jacque Johnson	Alan Dershowitz	Joint W/P Priv.
16578-16581	09/17/2009	Katherine Ezell	Jacque Johnson	RE:Depo	Joint W/P Priv.
16582-16585	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Deposition of Jean Luc Bruhnel	Joint W/P Priv.
16585-16611	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo	Joint W/P Priv.
16612-16439	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo of Mark Epstein	Joint W/P Priv.
16440	08/18/2009	Spencer Kuvin	Jacque Johnson	RE:Epstein Sub to Bear Stearn	Joint W/P Priv.
16740-16753	09/22/2009	Margaret Berk	Jacque Johnson	RE:Epstein Depos	Joint W/P Priv.
16443-16452	09/09/2009	Katherine Ezell	Jacque Johnson	RE:Epstein-Depos of Marcinkova & Sarah Keller	Joint W/P Priv.
16777-16786	09/30/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
16793-16794	10/01/2009	Lisa Rivera	Jacque Johnson	RE:Depo of David Hart Rogers	Joint W/P Priv.
16462-16477	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
16802-16823	10/02/2009	Margaret Berk	Jacque Johnson	RE:Epstein depos	Joint W/P Priv.
16483-16486	09/10/2009	Katherine Ezell	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16874-16880	10/13/2009	Adam Horowitz	Jacque Johnson	Depo	Joint W/P Priv.
16904-16905	10/14/2009	Spencer Kuvin	Jacque Johnson	RE:Epstein	Joint W/P Priv.
16945	10/26/2009	Kikka Claudio	Jacque Johnson	RE:Epstein depositions on 10/28	Joint W/P Priv.
17033-17034	10/26/2009	Kikka Claudio	Jacque Johnson	RE:Epstein depositions on 10/28	Joint W/P Priv.
02065-02068	06/08/2009	Bradley Edwards	Mercedes Estrada	FW:Epstein-Confirming AT&T Dial Telephone Conference for Mon 6/8/09 at 2:00 p.m.	Joint W/P Priv.
02070	09/02/2009	Jacque Johnson	Spencer Kuvin	FW:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
02071	08/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Sub to Bear Sterns	Joint W/P Priv.
02072-02078	09/04/2009	Jacque Johnson	Spencer Kuvin	FW:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
03466-03468	05/14/2009	Spencer Kuvin	Bradley Edwards	RE:Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order on Motion to Stay	Joint W/P Priv.
02301-02302	09/09/2009	Paul Cassel	Bradley Edwards	FW:Epstein	Joint W/P Priv.
03122-03123	06/10/2009	Adam Horowitz	Bradley Edwards	FW: Motion to Dismiss	Joint W/P Priv.
02805-02806	05/26/2009	Susan Stirling	Katherine Ezell	RE:WPB-Confidential-Genereal-Financial Disclosure/Discovery	Joint W/P Priv.
02670-02671	10/21/2009	Bradley Edwards	Spencer Kuvin	FW:Subpoena Info	Joint W/P Priv.
02517-02519	10/02/2009	Bradley Edwards	Katherine Ezell	FW:Meeting w/Stamley Arkin	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02614-02617	08/05/2009	Bradley Edwards	Kikka Claudio	FW:Proposal Request	Joint W/P Priv.
15702-15704	10/02/2009	Bradley Edwards	Katherine Ezell	FW:Meeting w/Stamley Arkin	Joint W/P Priv.
15581-15585	09/28/2009	Bradley Edwards	Amy Ederi	FW:Epstein Depo	Joint W/P Priv.
15431-15433	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
15797-15798	10/14/2009	Spencer Kuvin	Bradley Edwards	RE:Epstein	Joint W/P Priv.
11560-11562	10/02/2009	Bradley Edwards	Katherine Jacque Johnson	FW:Meeting w/Stamley Arkin	Joint W/P Priv.
11444-11448	09/28/2009	Bradley Edwards	Amy Ederi	FW:Epstein Depo	Joint W/P Priv.
05823	09/04/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
05832	09/08/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
05838	09/08/2009	Jacque Johnson	Jack Hill	RE:Epstein	Joint W/P Priv.
05847	09/09/2009	Jacque Johnson	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05859	07/23/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05863-05864	07/23/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05886-05887	07/24/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05902-05903	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05906-05907	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05912	08/27/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05928-05930	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05933-05934	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05936	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05938	09/18/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
05940-05941	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05951	05/29/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05957-05960	09/09/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.
05970-05971	10/21/2009	Jacquie Johnson	Margaret Berk	RE:Epstein	Joint W/P Priv.
05982-05983	10/28/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05993-05994	09/09/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
05997	08/06/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.

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01029	10/08/2009	Bradley Edwards	Carolyn Edwards	Brian Ryalls	Joint W/P Priv.
07707	09/03/2009	Bradley Edwards	Kikka Claudio	RE:Regarding:C.M.A. vs. Epstein. Et al.(File# 281849)	Joint W/P Priv.
07708-07709	06/22/2009	Bradley Edwards	Amy Ederi	RE:Regular Monthly Cong. Call	Joint W/P Priv.
07734	07/24/2009	Jessica Caldwell	Bradley Edwards	RE:Release	Joint W/P Priv.
07218-07219	10/02/2009	Bradley Edwards	Katherine Ezell	RE:Meeting w/Stamley Arkin	Joint W/P Priv.
06861-06863	05/12/2009	Bradley Edwards	Katherine Ezell	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06876-06879	05/12/2009	Bradley Edwards	Stuart Mermelstein	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06891-06897	05/12/2009	Bradley Edwards	Katherine Ezell	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06901	09/11/2009	Bradley Edwards	Mercedes Estrada	Re:Jane Doe No. 101 & Jane Doe No. 102 vs. Epstein-Cross Notice Of Depos	Joint W/P Priv.
06902	09/15/2009	Bradley Edwards	Mercedes Estrada	RE: Jane Doe No.101 & Jane Doe NO.102 vs. Epstein	Joint W/P Priv.
06903	09/04/2009	Bradley Edwards	Mercedes Estrada	RE: Jane Doe No.101 & Jane Doe NO.102 vs. Epstein-Cross-Notice of Taking Video Deposition	Joint W/P Priv.
06806-06807	09/09/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
06712	10/19/2009	Bradley Edwards	Kikka Claudio	RE: Igor Zinoview depo	Joint W/P Priv.
06713-06714	09/15/2009	Bradley Edwards	Robert Josefberg	RE:Epstein	Joint W/P Priv.

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06720-06727	10/14/2009	Bradley Edwards	Jack Hill	RE: Igor Zinoviev depo	Joint W/P Priv.
06728	09/09/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.
06711	09/09/2009	Kikka Claudio	Bradley Edwards	RE:Epstein	Joint W/P Priv.
06472	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06460-06464	05/08/2009	Bradley Edwards	Spencer Kuvin	RE:FYI Epstein Depo	Joint W/P Priv.
06455-06459	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06448-06452	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06420-06427	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06416-06419	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
05925-05926	07/28/2009	Katherine Ezell	Bradley Edwards	FW:Epstein	Joint W/P Priv.
05883-05584	07/24/2009	Katherine Ezell	Bradley Edwards	RE:Epstein	Joint W/P Priv.
05022-05025	09/10/2010	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
04724-04725	05/27/2009	Bradley Edwards	Katherine Ezell	RE:Epstein Cases-depositions in federal cases	Joint W/P Priv.
BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
06990-07002	06/11/2009	Brad Edwards	Katherine W. Ezell	June 10 th hearing-WPB-Confidential	Joint-privilege
07003-07006	06/26/2009	Amy Ederi	Brad Edwards	June 25 th hearing-WPB-	Joint-privilege

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				Confidential	
07030	09/22/2009	Bradley J. Edwards	Spencer Kuvin	L.M. v. Epstein – defendant, Jeffrey Epstein's response to plaintiff	Joint-privilege
07090-07091	9/29/2009	Bradley J. Edwards	Katherine W. Ezell	Leslie Wexner	Joint-privilege
07092	10/29/2009	Stuart Mermelstein	Bradley J. Edwards	Leslie Wexner	Joint-privilege
07093	09/17/2009	Bradley J. Edwards	Katherine W. Ezell	Leslie Wexner	Joint-privilege
01484	05/21/2009	Robert C. Josefsberg	Bradley J. Edwards	Epstein	Joint-privilege
01503	08/24/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01517	09/18/2009	Adam Horowitz; Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01514	08/26/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01515	08/27/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01477	07/21/2009	Adam Horowitz; Stuart Mermelstein	Bradley J. Edwards	Epstein	Joint-privilege
01489	08/03/2009	Adam Horowitz	Bradley J. Edwards	Epstein	Joint-privilege
07110-07112	09/25/2009	Bradley J. Edwards	Spencer Kuvin	LM v EPSTEIN hearing 9/22/09	
07113-07114	09/25/2009	Spencer Kuvin	Bradley J. Edwards	LM v EPSTEIN hearing 9/22/09	Joint-privilege
07115-07116	09/25/2009	Bradley J. Edwards	Spencer Kuvin	LM v EPSTEIN hearing 9/22/09	Joint-privilege
07145-07146	09/22/2009	Adam Horowitz	Bradley J. Edwards	Mark Epstein	Joint-privilege
07211-07213	10/01/2009	Bradley J. Edwards	Spencer Kuvin	Meeting with Stanley Arkin	Joint-privilege
07210	10/06/2009	Stuart Mermelstein; Robert C. Josefsberg;	Katherine W. Ezell	Meeting with Leslie Wexner	Joint-privilege

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		Bradley J. Edwards			
07214-07215	10/01/2009	Robert C. Josefsberg	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
07216-07217	10/02/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
07220-07223	10/01/2009	Spencer Kuvin	Bradley J. Edwards	Meeting with Stanley Arkin	Joint-privilege
07224-07225	10/02/2009	Katherine W. Ezell	Bradley J. Edwards	Meeting with Stanley Arkin	Joint-privilege
07226-07227	10/01/2009	Robert C. Josefsberg	Spencer Kuvin	Meeting with Stanley Arkin	Joint-privilege
07228-07229	10/01/2009	Bradley J. Edwards	Robert C. Josefsberg	Meeting with Stanley Arkin	Joint-privilege
07280-07283	08/06/2009	Adam Horowitz	Bradley J. Edwards	Motion for protective order	Joint-privilege
07633-07634	08/06/2009	Bradley J. Edwards	Kikka M. Claudio	Proposal Request	Joint-privilege
07710-07733	06/23/2009	Katherine W. Ezell	Bradley J. Edwards	Regularly Monthly Cong. Call	Joint-privilege
07740-07746	09/18/2009	Bradley J. Edwards	Adam Horowitz	Report this as a parole violation	Joint-privilege
07748-07757	09/18/2009	Adam Horowitz	Bradley J. Edwards	Report this as a parole violation	Joint-privilege
07913-07915	08/27/2009	Bradley J. Edwards	Spencer Kuvin	Sarah Kellen	Joint-privilege
07917-07918	08/27/2009	Spencer Kuvin	Jacque Johnson	Sarah Kellen	Joint-privilege
07965-07966	08/12/2009	Katherine W. Ezell	Bradley J. Edwards	Subpoena directed to the investigators	Joint-privilege
07977-07978	10/09/2009	Bradley J. Edwards	Spencer Kuvin	Subpoena Info	Joint-privilege
01716	09/15/2009	Adam Horowitz	Elizabeth Villar	Epstein: Forensics/Investigations INVOICE	Joint-privilege
01768	07/13/2009	Richard Willits	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01771-01772	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01931	08/11/2009	Bradley J.	Lisa Rivera	Alfredo Rodriguez	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Edwards			
01998-01999	09/21/2009	Adam Horowitz	Margaret Berk	Correct Number – Epstein Deposition	Joint-privilege
02021	05/14/2009	Bradley J. Edwards	Mercedes C. Estrada	Doe v. Epstein	Joint-privilege
02044	09/04/2009	Katherine W. Ezell	Bradley J. Edwards	E.W., L.M. Doe v. Epstein – Letter from Bob Critton	Joint-privilege
02048	09/04/2009	Robert C. Josefsberg	Bradley J. Edwards	E.W., L.M. Doe v. Epstein – Letter from Bob Critton	Joint-privilege
02054	05/12/2009	Spencer Kuvin	Bradley J. Edwards	Emailing Epstein deposition revised	Joint-privilege
02062	10/05/2009	Bradley J. Edwards	Amy Ederi	Epstein – Confirming AT&T Dial in Tel. Conf. for Monday, 10/5/09 at 4:00 p.m.	Joint-privilege
02087	09/17/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Hearing	Joint-privilege
02140	08/04/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Depo – New York	Joint-privilege
02147-02149	09/21/2009	Bradley J. Edwards	Amy Ederi	Epstein Depo	Joint-privilege
02174	07/20/2009	Adam Horowitz	Bradley J. Edwards	Epstein Matter – Cross Notice of Alfredo Rodriguez Deposition	Joint-privilege
02209-02210	07/01/2009	Bert Patton	William J. Berger	Epstein v. State of Florida – Emergency petition for Writ of Certiorari; Emergency motion to review denial of stay	Joint-privilege
02215-02217	07/24/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
02290	09/18/2009	Bradley J. Edwards	Spencer Kuvin	Epstein	Joint-privilege
02355-02356	06/10/2009	Mercedes C. Estrada	Susan K. Stirling	Hearing taken on 06/10/09 on motion to unseal before Judge Colbath	Joint-privilege
02362-02363	06/09/2009	Spencer Kuvin	Katherine W. Ezell	Hearing to Un-seal	Joint-privilege
02374-02375	09/15/2009	Jack Hill	Bradley J. Edwards	Igor Zinoview depo	Joint-privilege

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02420-02421	05/08/2009	Bradley Edwards J.	Mercedes Estrada C.	Jane Doe II v. Epstein	Joint-privilege
02435	09/15/2009	Bradley Edwards J.	Lisa Rivera	Jane Does v. Epstein	Joint-privilege
02438	09/18/2009	Bradley Edwards J.	Adam Horowitz	Jeffrey Epstein DC# W35755	Joint-privilege
02462	09/22/09	Spencer Kuvin	Bradley J. Edwards	L.M. v. Epstein – Defendant, Jeffrey Epstein’s Response to Plaintiff L.M.’s Motion for Protective Order	Joint-privilege
02476-02477	09/25/2009	Spencer Kuvin	Bradley J. Edwards	LM v EPSTEIN hearing	Joint-privilege
02516	10/06/2009	Bradley Edwards J.	Katherine W. Ezell	Meeting with Leslie Wexner	Joint-privilege
02554-02559	08/03/2009	Adam Horowitz	Bradley J. Edwards	NEW ASSIGNMENT – NEW ALBANY – RUSH? – Fwd: Federal Subpoena	Joint-privilege
02584	08/11/2009	Bradley Edwards J.	Kikka M. Claudio	Out of state subpoenas	Joint-privilege
02618	08/04/2009	Bradley Edwards J.	Kikka M. Claudio	Proposal Request	Joint-privilege
02627-02628	09/18/2009	Bradley Edwards J.	Adam Horowitz	Report this as a parole violation	Joint-privilege
02672-02673	10/09/2009	Spencer Kuvin	Bradley J. Edwards	Subpoena Info	Joint-privilege
02727	08/03/2009	Spencer Kuvin	Bradley J. Edwards	Transcript of Alfredo Rodriguez deposition	Joint-privilege
02896	06/08/2009	Bradley Edwards J.	Spencer Kuvin	Hearing to Un-seal	Joint-privilege
03009-03010	08/07/2009	Adam Horowitz	Jacquie Johnson	Motion to stay	Joint-privilege
03028-03029	09/21/2009	Bradley Edwards J.	Adam Horowitz	Mark Epstein	Joint-privilege
03038	10/06/2009	Bradley Edwards J.	Stuart Mermelstein	Meeting with Leslie Wexner	Joint-privilege
03131-03132	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epsteins assets	Joint-privilege

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03243-03244	09/09/2009	Bradley J. Edwards	Adam Horowitz	EPSTEIN	Joint-privilege
03397-03400	09/29/2009	Adam Horowitz	Bradley J. Edwards	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Response in Opposition to Motion	Joint-privilege
03407-03414	09/29/2009	Bradley J. Edwards	Adam Horowitz	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Response in Opposition to Motion	Joint-privilege
03451-03452	05/14/2009	Bradley J. Edwards	Spencer Kuvin	Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order on Motion to Stay	Joint-privilege
03477-03479	05/15/2009	Bradley J. Edwards	Spencer Kuvin	Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order to Motion to Stay	Joint-privilege
03619-03627	09/15/2009	Bradley J. Edwards	Spencer Kuvin	BB v. Epstein/EW v. Epstein	Joint-privilege
03631-03633	09/15/2009	Jacquie Johnson	William J. Berger	BB v. Epstein/EW v. Epstein	Joint-privilege
03646-03656	10/19/2009	Bradley J. Edwards	Katherine W. Ezell	Bill Riley's Subpoena & Depo Notice	Joint-privilege
03677-03687	07/08/2009	Bradley J. Edwards	Adam Horowitz	Can you send me those addresses?	Joint-privilege
03719-03736	09/04/2009	Bradley J. Edwards	Spencer Kuvin	CMA – depo notices attached.	Joint-privilege
03840-03847	08/02/2009	Stuart Mermelstein	Bradley J. Edwards	Continuing Deposition of Alfredo Rodriguez	Joint-privilege
03938-03939	09/29/2011	Katherine W. Ezell	Bradley J. Edwards	Deposition of Bill Riley	Joint-privilege
03943-03945	09/18/2009	Adam Horowitz	Jacquie Johnson	Deposition of Jean Luc Bruhnel	Joint-privilege
02911-02912	09/15/2009	Bradley J. Edwards	Jack P. Hill	Igor Zinoview depo	Joint-privilege
02939	07/14/2009	Bradley J. Edwards	Adam Horowitz	Jane Does 2-7 v. Epstein	Joint-privilege
02977	10/16/2009	Katherine W.	Bradley J. Edwards	Leslie Wexner	Joint-privilege

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		Ezell			
02978	10/29/2009	Bradley Edwards	J. Stuart Mermelstein	Leslie Wexner	Joint-privilege
02994	06/10/2009	Bradley Edwards	J. Mercedes Estrada	C. Preservation of evidence	Joint-privilege
07060	10/16/2009	Sid Garcia	Bradley J. Edwards	L.M. v. Epstein	Joint-privilege
06202	07/13/2009	Richard Willits	Bradley J. Edwards	Scheduling various depositions regarding Epstein	Joint-privilege
06409-06415	04/15/2009	Bradley Edwards	J. Katherine W. Ezell	FYI	Joint-privilege
06428-06447	05/06/2009	Spencer Kuvin	Bradley J. Edwards	FYI	Joint-privilege
06453-06454	04/15/2009	Spencer Kuvin	Bradley J. Edwards	FYI	Joint-privilege
06465-06471	04/15/2009	Katherine W. Ezell	Bradley J. Edwards	FYI	Joint-privilege
06476-06490	05/08/2009	Bradley Edwards	J. Spencer Kuvin	FYI	Joint-privilege
06630-06632	09/09/2009	Spencer Kuvin	Bradley J. Edwards	Hearing to Un-seal	Joint-privilege
06636-06639	09/09/2009	Bradley Edwards	J. Robert C. Josefsberg	Hearing to Un-seal	Joint-privilege
06702-06705	09/16/2009	Bradley Edwards	J. Kikka M. Claudio	Igor Zinoviev & Tommy Matola depos	Joint-privilege
06706-06708	10/14/2009	Bradley Edwards	J. Kikka M. Claudio	Igor Zinoviev depo	Joint-privilege
06715-06719	10/09/2009	Jack P. Hill	Bradley J. Edwards	Igor Zinoviev depo	Joint-privilege
06729-06735	10/13/2009	Bradley Edwards	J. Jack P. Hill	Igor Zinoviev depo	Joint-privilege
06763	08/19/2009	Bradley Edwards	J. Stuart Mermelstein	IME's	Joint-privilege
06764-06766	09/10/2009	Bradley Edwards	J. Stuart Mermelstein	IME's	Joint-privilege
06770-06781	09/10/2009	Stuart Mermelstein	Bradley J. Edwards	IME's	Joint-privilege
06811-06812	08/20/2009	Katherine W.	Bradley J. Edwards	Is Mark Epstein JE's brother?	Joint-privilege

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		Ezell			
06817-06819	09/23/2009	Adam Horowitz	Bradley J. Edwards	Is your client being deposed tomorrow?	Joint-privilege
06820-06822	07/02/2009	Bradley J. Edwards	Margaret Berk	Jane Doe 2 (Brinson) v. Epstein	Joint-privilege
06841-06860	05/12/2009	Bradley J. Edwards	Spencer Kuvin	Jane Doe II v. Epstein	Joint-privilege
06864-06875	05/12/2009	Spencer Kuvin	Bradley J. Edwards	Jane Doe II v. Epstein	Joint-privilege
06880-06890	05/12/2009	Bradley J. Edwards	Katherine W. Ezell	Jane Doe II v. Epstein	Joint-privilege
06898-06900	05/12/2009	Bradley J. Edwards	Stuart Mermelstein	Jane Doe II v. Epstein	Joint-privilege
06933-06934	07/14/2009	Adam Horowitz	Bradley J. Edwards	Jane Does 2-7 v. Epstein	Joint-privilege
06937-06938	10/05/2009	Spencer Kuvin	Jacquie Johnson	Jane Does 2-8 v. Epstein – Cross NOD's of Oct. 6-8 depos	Joint-privilege
06944-06952	09/22/2009	Bradley J. Edwards	Adam Horowitz	Jeffrey Epstein DC# W35755	Joint-privilege
16107	08/11/2009	Adam Horowitz	Jacquie Johnson	Maxwells deposition	Joint-privilege
16123-16124	08/11/2009	Kikka M. Claudio	Jacquie Johnson	Maxwells deposition	Joint-privilege
16799-16801	10/02/2009	Robert C. Josefbergs	Jacquie Johnson	Meeting with Stanley Arkin	Joint-privilege
02947-02948	08/03/2009	Spencer Kuvin	Jacquie Johnson	Epstein Depo – New York	Joint-privilege
02891-20906	10/01/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
20880-20882	10/02/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
06042-06090	07/02/2009	William J. Berger	Spencer Kuvin	Ew 09-22784 cert.4 th dca	Joint-privilege
06402-06403	06/10/2009	Bradley J. Edwards	Katherine W. Ezell	Hearing to Un-seal	Joint-privilege
01365-01366	09/15/2009	Adam Horowitz	Jacquie Johnson	Epstein Hearing	Joint-privilege
01340-01341	07/30/2009	Adam Horowitz	Jacquie Johnson	Epstein Depositions	Joint-privilege
01331	06/30/2009	Stuart	Bradley J. Edwards	Epstein depositions	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Mermelstein			
01319	08/11/2009	Adam Horowitz	Jacque Johnson	Epstein Depo	Joint-privilege
01316	08/27/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Depo	Joint-privilege
01314	10/30/2009	Stuart Mermelstein	Jacque Johnson	Epstein Depo of Wexner	Joint-privilege
01298	05/26/2009	Bradley J. Edwards	Adam Horowitz	Epstein cases -- depositions in federal cases	Joint-privilege
01294	08/10/2009	Jack P. Hill	Bradley J. Edwards	Epstein Assets	Joint-privilege
01273	07/13/2009	Katherine W. Ezell	Bradley J. Edwards	Epstein 2255 claims	Joint-privilege
01250	05/13/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein	Joint-privilege
01246	04/08/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Telephone Conference	Joint-privilege
01233-01234	07/31/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Monday, 8/3/09 -- Monthly call in telephone conference -- AT&T Call in No: (877) 468-2136 -- participant code: 775593. Kathy is the host.	Joint-privilege
01224	06/16/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Monday, 8/3/09 -- Monthly call in telephone conference -- AT&T Call in No: (877) 468-2136 -- participant code: 775593. Kathy is the host.	Joint-privilege
01185	10/30/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Confirming AT&T dial in tel. conf. for Monday, 11/2/09 at 4:00 p.m.	Joint-privilege
01186	10/02/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Confirming AT&T Dial in Tel. Conf. for Monday, 10/5/09 at 4:00 p.m.	Joint-privilege
01187	05/19/2009	Bradley J. Edwards	Mercedes Estrada	C. Epstein -- Confirming AT&T Dial in Telephone Conference for Monday, 6/8/09 at 2:00 p.m.	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01188	05/12/2009	Bradley Edwards	J. Mercedes Estrada	C. Epstein – Confirming AT&T Dial in Telephone Conference for Tomorrow 5/13/09	Joint-privilege
01189	09/08/2009	Bradley Edwards	J. Iliana Yarzabal	Epstein – Confirming AT&T Dial in Telephone Conference for Wednesday, 9/9/09 at 3:00	Joint-privilege
01095-01096	04/15/2009	Spencer Kuvin	Bradley J. Edwards	Deposition of Epstein was set for tomorrow	Joint-privilege
01045	07/23/2009	Bradley Edwards	J. Richard Willits	CMA vs. Epstein	Joint-privilege
01649	07/08/2009	Bradley Edwards	J. Mercedes Estrada	C. Epstein	Joint-privilege
01641	06/11/2009	Bradley Edwards	J. Mercedes Estrada	C. Epstein	Joint-privilege
01639	05/29/2009	Bradley Edwards	J. Mercedes Estrada	C. Epstein	Joint-privilege
01619	10/28/2009	Bradley Edwards	J. Spencer Kuvin	Epstein	Joint-privilege
01660	07/22/2009	Bradley Edwards	J. Adam Horowitz	Epstein	Joint-privilege
01666	04/20/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01671	07/23/2009	Katherine W. Ezell	Bradley J. Edwards	Epstein	Joint-privilege
01680	08/24/2009	Jack P. Hill	Bradley J. Edwards	Epstein	Joint-privilege
04355-04358	09/04/2009	Jack Scarola	Bradley J. Edwards	Epstein – Depos of Marcinkova and Sarah Kellen	Joint-privilege
04446	09/03/2009	Bradley Edwards	J. Iliana Yarzabal	Epstein – Monday 8/3/09 – Monthly Call in Telephone Conference	Joint-privilege
04200-04201	09/04/2009	Bradley Edwards	Katherine W. Ezell	Letter from Bob Critton	Joint W/P Privilege
04220— 04221	09/04/2009	Bradley Edwards	Spencer Kuvin	Letter from Bob Critton	Joint W/P Privilege
04222-04223	09/04/2009	Bradley Edwards	Barry Stone	Letter from Bob Critton	Joint W/P Privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
04264	05/12/2009	Bradley Edwards	Spencer Kuvin	Epstein Depo	Joint W/P Privilege
04298-04299	09/16/2009	Jacquie Johnson	Adam Horowitz	Depo of Epstein	Joint W/P Privilege
04304	09/08/2009	Jacquie Johnson	Adam Horowitz	Epstein	Joint W/P Priv.
04335	10/30/2009	Bradley Edwards	Robert Josefsberg	Epstein- Confirming AT&T Tel. Conf.	Joint W/P Priv.
04359-04360	09/04/2009	Jacquie Johnson	Katherine Ezell	Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
04365	09/15/2009	Jacquie Johnson	Adam Horowitz	Epstein- Depo in New York	Joint W/P Priv.
04417	09/17/2009	Bradley Edwards	Spencer Kuvin	Epstein- Hearing	Joint W/P Priv.
04423-04424	09/09/2009	Jacquie Johnson	Adam Horowitz	Letter regarding Leslie Wexner	Joint W/P Priv.
04433-04436	06/16/2009	Spencer Kuvin	Bradley Edwards	Monthly Call in Tele. Conf.	Joint W/P Priv.
04447-04450	07/31/2009	Jacquie Johnson	Mercedes Estrada	Monthly Call in Tel. Conf.	Joint W/P Priv.
04491-04518	04/08/2009	Bradley Edwards	Jack Scarola	Epstein- Tel. Conf.	Joint W/P Priv.
04518	04/08/2009	Bradley Edwards	Robert Josefsberg	Epstein- Tel Conf.	Joint W/P Priv.
04524-04525	05/13/2009	Katherine Ezell	Bradley Edwards	Epstein Depo	Joint W/P Priv.
04580	10/14/2009	Jacquie Johnson	Adam Horowitz	Depo of Larry Visoski	Joint W/P Priv.
04640-04641	10/14/2009	Bradley Edwards	Adam Horowitz	Depo of Larry Visoski	Joint W/P Priv.
04723	05/26/2009	Bradley Edwards	Katherine Ezell	Epstein cases- Depos	Joint W/P Priv.
04726-04729	05/26/2009	Adam Horowitz	Bradley Edwards	Epstein cases- Witness depos	Joint W/P Priv.
04750-04754	08/04/2009	Spencer Kuvin	Bradley Edwards	Epstein depo- New York	Joint W/P Priv.
04763-04785	08/27/2009	Spencer Kuvin	Bradley Edwards	Epstein Depo Notice	Joint W/P Priv.
04797-04799	09/18/2009	Jacquie Johnson	Adam Horowitz	Epstein Depo	Joint W/P Priv.
04806-04813	07/28/2009	Jacquie Johnson	Adam Horowitz	Epstein Depos in New York	Joint W/P Priv.
04819	07/30/2009	Jack Scarola	Jacquie Johnson	Epstein Depos	Joint W/P Priv.
04831-04832	07/30/2009	Spencer Kuvin	Jacquie Johnson	Epstein Depos	Joint W/P Priv.
04835-04836	07/25/2009	Katherine Ezell	Bradley Edwards	Epstein Depos	Joint W/P Priv.

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04711	08/10/2009	Bradley Edwards	Jack Hill	Epstein assests	Joint W/P Priv.
04855-04858	08/18/2009	Bradley Edwards	Kikka Claudio	Epstein Depos	Joint W/P Priv.
04861	07/24/2009	Lisa Rivera	Jacque Johnson	Epstein Depos	Joint W/P Priv.
04876-04877	07/27/2009	Bradley Edwards	Spencer Kuvn	Epstein Depos	Joint W/P Priv.
04922-04923	09/16/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04925-04926	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04929-04934	09/25/2009	Bradley Edwards	Adam Horowitz	Epstein Hearing	Joint W/P Priv.
04937-04938	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04969-04972	07/20/2009	Adam Horowitz	Bradley Edwards	Alfredo Rodriguez Depo	Joint W/P Priv.
05026-05027	09/10/2009	Adam Horowitz	Jacque Johnson	Notice of Production from Non-Parties	Joint W/P Priv.
05031	09/25/2009	Bradley Edwards	Spencer Kuvn	Epstein Order	Joint W/P Priv.
05037-05038	09/25/2009	Bradley Edwards	Spencer Kuvn	Epstein Order	Joint W/P Priv.
05042-05043	09/25/2009	Spencer Kuvn	Bradley Edwards	Epstein Order	Joint W/P Priv.
05046	09/25/2009	Bradley Edwards	Spener Kuvn	Epstein Order	Joint W/P Priv.
05074-05076	08/18/2009	Stuart Mermelstein	Jacque Johnson	Epstein Sub. To Bears Stern	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05100-05102	08/05/2009	Mercedes Estrada	Bradley Edwards	Improper Serving of Maxwell	Joint W/P Priv.
05105-05107	04/20/2009	Bradley Edwards	Spencer Kuvin	Hearing on Yellow Cab Objection	Joint W/P Priv.
05110	08/06/2009	Adam Horowitz	Kikka Claudio	Address for Nadia Marcinkova	Joint W/P Priv.
05118-05119	09/09/2009	Adam Horowitz	Bradley Edwards	Motion for Protective Order	Joint W/P Priv.
05157-05158	09/10/2009	Adam Horowitz	Bradley Edwards	Motion for Protective Order	Joint W/P Priv.
05167-05168	05/29/2009	Bradley Edwards	Margaret Berk	Spencer Cross-Examination	Joint W/P Priv.
05171-05172	05/29/2009	Bradley Edwards	Mercedes Estrada	Transcripts	Joint W/P Priv.
05201-05202	09/10/2009	Adam Horowitz	Bradley Edwards	Rules on Doe no. 4	Joint W/P Priv.
05222-05223	07/10/2009	Bradley Edwards	Katherine Ezell	File case	Joint W/P Priv.
05226	07/10/2009	Bradley Edwards	Spencer Kuvin	Epstein 5 th Amendment rights	Joint W/P Priv.
05229	07/10/2009	Bradley Edwards	Adam Horowitz	Motions to Compel	Joint W/P Priv.
05232-05233	07/10/2009	Bradley Edwards	Adam Horowitz	Motions fully briefed	Joint W/P Priv.
05247	07/23/2009	Katherine Ezell	Bradley Edwards	Answers to the 1 st set of ROGS	Joint W/P Priv.
05251-05252	07/24/2009	Katherine Ezell	Bradley Edwards	Depo dates	Joint W/P Priv.
05258	07/25/2009	Katherine Ezell	Bradley Edwards	Switzerland Witness regarding Epstein Egg Shaped 2 inch PENIS!	Joint W/P Priv.
05265-05266	07/22/2009	Adam Horowitz	Spencer Kuvin	Alfredo Rodriguez depo	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05286-05287	07/28/2009	Katherine Ezell	Bradley Edwards	Switzerland Witness regarding training of little girls as sex traps	Joint W/P Priv.
05293-05294	07/28/2009	Katherine Ezell	Bradley Edwards	Calling Switzerland witness	Joint W/P Priv.
05326-05327	08/24/2009	Bradley Edwards	Spencer Kuvin	Emails searchable	Joint W/P Priv.
05331	08/06/2009	Kikka Claudio	Bradley Edwards	Epstein address	Joint W/P Priv.
05334-05335	05/29/2009	Bradley Edwards	Mercedes Estrada	TV Interview that is too explicit	Joint W/P Priv.
05347	08/24/2009	Bradley Edwards	Spencer Kuvin	Seeking Computers	Joint W/P Priv.
05350	08/10/2009	Kikka Claudio	Bradley Edwards	Current address for Nadia Marcinkova	Joint W/P Priv.
05353-05354	09/09/2009	Katherine Ezell	Bradley Edwards	Distribution of Costs	Joint W/P Priv.
05367	09/10/2009	Jacquie Johnson	Bradley Edwards	Voicemail	Joint W/P Priv.
05373-05374	08/10/2009	Kikka Claudio	Bradley Edwards	Supoenas for depos	Joint W/P Priv.
05391-05393	04/20/2009	Spencer Kuvin	Bradley Edwards	Yellow Cab stuff	Joint W/P Priv.
05400-05401	10/19/2009	Adam Horowitz	Bradley Edwards	Religious Dildo Washer	Joint W/P Priv.
05414-05415	08/10/2009	Kikka Claudio	Bradley Edwards	Sjoberg's current address	Joint W/P Priv.
05437-05439	04/20/2009	Bradley Edwards	Spencer Kuvin	Yellow Cab stuff	Joint W/P Priv.
05444-05445	08/10/2009	Bradley Edwards	Kikka Claudio	Setting Depos	Joint W/P Priv.
05451	05/29/2009	Mercedes Estrada	Bradley Edwards	Motion for Status Conf.	Joint W/P Priv.

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05469	07/08/2009	Mercedes Estrada	Bradley Edwards	Judge Marra's July 6 th Order	Joint W/P Priv.
05476-05494	07/08/2009	Spencer Kuvin	Bradley Edwards	NPA from Marie Villafana	Joint W/P Priv.
05546	08/03/2009	Adam Horowitz	Bradley Edwards	Haley's affidavit	Joint W/P Priv.
05579-05581	08/24/2009	Spencer Kuvin	Bradley Edwards	Seeking all of Plaintiff's computer	Joint W/P Priv.
05613-05618	09/18/2009	Spencer Kuvin	Bradley Edwards	Non-Pros Agreement	Joint W/P Priv.
05633	10/16/2009	Adam Horowitz	Bradley Edwards	Motion to freeze assets	Joint W/P Priv.
05638-05639	10/28/2009	Spencer Kuvin	Bradley Edwards	Daliah Weiss	Joint W/P Priv.
05647	07/09/2009	Adam Horowitz	Katherine Ezell	NPA under seal for in camera review	Joint W/P Priv.
05656	08/10/2009	Bradley Edwards	Kikka Claudio	Supoenas for depo	Joint W/P Priv.
05659	08/27/2009	Bradley Edwards	Spencer Kuvin	Order	Joint W/P Priv.
05668	10/16/2009	Bradley Edwards	Adam Horowitz	Florida Science Foundation	Joint W/P Priv.
05705	09/09/2009	Mercedes Estrada	Kikka Claudio	Video tape of Epstein	Joint W/P Priv.
05724	05/29/2009	Bradley Edwards	Jack Scarola	Motion for Status Conf.	Joint W/P Priv.
05727	05/29/2009	Bradley Edwards	Sid Garcia	Motion for Status Conf.	Joint W/P Priv.
05730-05731	08/14/2009	Adam Horowitz	Jacque Johnson	Motion for Status Conf.	Joint W/P Priv.
05734	05/29/2009	Adam Horowitz	Jacque Johnson	Motion for status conf.	Joint W/P Priv.

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05737	08/12/2009	Adam Horowitz	Jacque Johnson	NPNP and sub to Palm Beach Natl Bank	Joint W/P Priv.
05750	05/29/2009	Mercedes Estrada	Spencer Kuvn	Motion for status conf.	Joint W/P Priv.
05770	07/08/2009	Bradley Edwards	Spencer Kuvn	NPA in camera review	Joint W/P Priv.
05774-05776	09/04/2009	Katherine Ezell	Jacque Johnson	Marcinkova being rescheduled	Joint W/P Priv.
05782-05783	07/09/2009	Bradley Edwards	Spencer Kuvn	Motion to appoint commissioner	Joint W/P Priv.
05788-05790	07/09/2009	Bradley Edwards	Spencer Kuvn	Notice and serve everyone	Joint W/P Priv.
05802	09/04/2009	Adam Horowitz	Jacque Johnson	Bill being split up evenly	Joint W/P Priv.
05806	09/04/2009	Jacque Johnson	Spencer Kuvn	Bill will be split evenly for each case	Joint W/P Priv.
05812	09/04/2009	Adam Horowitz	Jacque Johnson	Bill will be split evenly	Joint W/P Priv.
05814	08/03/2009	Bradley Edwards	Adam Horowitz	Haley's affidavit	Joint W/P Priv.
05818-05819	09/09/2009	Bradley Edwards	Robert Josefsberg	CMA Order	Joint W/P Priv.
01781	05/01/2009	Bradley Edwards	William Berger	Epstein Depo	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
07619	07/13/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
03181	09/14/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03181	09/14/2009	William Berger	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03182-03185	07/14/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03186-03188	05/01/2009	William Berger	Bradley Edwards	Epstein Depo	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13860-13874	05/28/2009	Elizabeth Kim	Christinia Fitch	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
14173	10/21/2009	Gary Farmer	Bradley Edwards	Stanely Arkin	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13419	08/11/2009	Denis Kleinfeld	Bradley Edwards	Trump's Depo	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03087	06/29/2010	Investigators	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03088	04/11/2009	Epstein Litigation	Russell Adler	Litigation Strategy	Work Product;attorney client

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Team			privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
03089-03099	05/03/2009	Attorneys and Staff	Russell Adler	RE: Setting Depos	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13445-13453	08/19/2009	Denis Kleinfeld	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
12281-12291	07/30/2009	Carl Linder	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09337-09340	08/10/2009	Barry Stone	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09350	10/21/2009	Barry Stone	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
09335	08/06/2009	Barry Stone	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11983	08/06/2009	Carl Linder	Jacque Johnson	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11984-11988	08/06/2009	Carl Linder	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					lead to the discovery of admissible evidence;protected by privacy rights
11995	08/19/2009	Carl Linder	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
12012	10/21/2009	Carl Linder	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11879	10/21/2009	Cara Holmes	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
11868	08/19/2009	Cara Holmes	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
10938	05/28/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13592	10/21/2009	Denis Kleinfeld	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
04421	05/21/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25814	05/28/2009	William Berger	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					evidence;protected by privacy rights
25778-25782	07/30/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25792-25797	05/28/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25798	08/06/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25799-25802	08/10/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25773	10/21/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25738	08/03/2009	William Berger	Beth Williamson	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
25739-25740	08/11/2009	William Berger	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
17940	07/30/2009	Jonathan Birkman	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
17917-17927	08/03/2009	Jonathan Birkman	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
17932-17934	05/28/2009	Jonathan Birkman	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
17935	05/28/2009	Jonathan Birkman	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
17936-17938	07/30/2009	Jonathan Birkman	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00014	05/01/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00015	05/04/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00016	05/04/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00017	05/06/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00018	05/06/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00019-00021	05/07/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00022	06/23/3009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00023	07/13/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00024	07/13/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00025-00029	05/01/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00030	05/02/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00031	05/03/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00032	05/03/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					lead to the discovery of admissible evidence;protected by privacy rights
00033-00034	05/03/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00035	05/05/2009	Bradley Edwards	Susan Sterling	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00036	05/06/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00037-00040	05/25/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00041	07/06/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00042	07/06/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
0043	05/05/2009	Bradley Edwards	Susan Sterling	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00044	08/17/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					evidence;protected by privacy rights
00045	05/01/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00046	05/01/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00047-00049	05/01/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00050	05/05/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00051	05/05/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00052	05/05/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00053	05/05/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00054	05/05/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
00055	04/29/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00056	05/05/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00057	05/05/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00058	05/05/2009	Bradley Edwards	Russell Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00059	05/05/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00060	05/05/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00061-0064	05/06/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00065	05/12/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00066	04/29/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00067	05/12/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00068	05/12/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00069-00070	05/13/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00071	05/13/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00072	05/15/2009	Bradley Edwards	Susan Sterling	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00073	05/15/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00074	05/18/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00075	05/18/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					lead to the discovery of admissible evidence;protected by privacy rights
00076	05/18/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00077	04/04/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00078	05/18/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00079	05/19/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00080	05/19/2009	Bradley Edwards	Beth Williamson	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00081-00082	05/20/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00083-00085	05/21/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00086-00087	05/25/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					evidence;protected by privacy rights
00088	04/30/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00089	05/28/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00090	05/28/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00091	05/28/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00092	05/28/2009	Bradley Edwards	Rob Buschell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00093	06/01/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00094-00095	06/23/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00096	07/06/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
00097	07/06/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00098-00100	07/07/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00101	07/09/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00102-00106	07/09/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00107	07/10/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00108	07/10/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00109	07/10/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00110	07/10/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00111	07/11/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00112-00120	05/012009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00121	05/12/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00122	05/12/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00123	05/12/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00124-00125	05/12/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00126	05/22/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00127	05/26/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
00128-00131	5/26/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00132	5/21/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00133	06/23/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00134	06/03/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00135-00137	06/03/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00138-00140	06/08/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00141	06/12/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00142	06/13/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00143-00145	06/15/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00146	06/29/2009	Bradley Edwards	William Berger	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00147	06/29/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00148	04/22/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00149	04/26/2009	Bradley Edwards	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00150	04/24/2009	Litigation Team	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
00151-00152	06/26/2009	Bradley Edwards	Rob Buschel	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
01036-01039	04/26/2009	Susan Sterling	Russell Adler	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
13313-13314	07/30/2009	Denis Kleinfeld	Bradley Edwards	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to

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					lead to the discovery of admissible evidence;protected by privacy rights
13315	08/03/3009	Denis Kleinfeld	Beth Williamson	Litigation Strategy	Work Product;attorney client privilege;irrelevant & reasonably calculated to lead to the discovery of admissible evidence;protected by privacy rights
01080-01081	06/22/2009	Robert C. Buschel	Bradley J. Edwards	Jane Doe brother	Attorney/Client privilege and/or work product
01077	05/28/2009	Robert C. Buschel	Bradley J. Edwards	Doe family member	Attorney/Client privilege and/or work product
02445-02446	05/05/2009	Bradley J. Edwards	Susan K. Stirling	Jones v. Atlantic asphalt	Attorney/Client privilege and/or work product
03049	09/21/2009	Bradley J. Edwards	D.F.	New addition to the case	Attorney/Client privilege and/or work product
02425-02426	06/17/2009	Susan K. Stirling	Bradley J. Edwards	Jane Doe v. Dukenik	Attorney/Client privilege and/or work product
02669	09/24/2009	Bradley J. Edwards	Jacque Johnson	Subpoena for Adriana Mucinska	Attorney/Client privilege and/or work product
02647	08/06/2009	Mike Fisten	Bradley J. Edwards	Samantha Lee Rivera info	Attorney/Client privilege and/or work product
03688-03691	04/03/2009	Robin T. Kempner	Bradley J. Edwards	Case number assignments	Attorney/Client privilege and/or work product
03692-03693	05/06/2009	Bradley J. Edwards	Susan K. Stirling	Case list	Attorney/Client privilege and/or work product
15678-15680	09/29/2009	Jacque Johnson	Bradley J. Edwards	Subpoena for Adriana Mucinska	Attorney/Client privilege and/or work product
15689	10/01/2009	Jacque Johnson	Bradley J. Edwards	Client information	Attorney/Client privilege and/or work product
02546-02547	09/22/2009	D.F.	Bradley J. Edwards	Client communication	Attorney/Client privilege and/or work product
02809-02810	09/28/2009	N.R.	Bradley J. Edwards	Client communication	Attorney/Client privilege and/or work product
02262	07/23/2009	Jacque Johnson	Bradley J. Edwards	Discussion re: client/victim personal information	Attorney/Client privilege and/or work product
02807-02808	10/01/2009	N.R.	Bradley J. Edwards	Client communication	Attorney/Client privilege and/or work product
03760-03828	04/01/2009	RRA Personnel	RRA personnel	Client names/types of action/client information	Attorney/Client privilege and/or work product, privacy right privilege, not relevant
03759	04/01/2009	Russell Adler	Bradley J. Edwards	Conflict Check for Brad Edwards files	Attorney/Client privilege and/or work product
08358-08359	09/14/2009	Pat Roberts	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product

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08364-08368	10/01/2009	Jacquie Johnson	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
08370	09/14/2009	Bradley J. Edwards	Pat Roberts	Client info	Attorney/Client privilege and/or work product
08374-08375	10/01/2009	Bradley J. Edwards	Jacquie Johnson	Client info	Attorney/Client privilege and/or work product
03878	06/12/2009	Bradley J. Edwards	Robert C. Buschel	Curtis Rivera	Attorney/Client privilege and/or work product
02955	04/20/2009	Susan K. Stirling	Bradley J. Edwards	Juskowich	Attorney/Client privilege and/or work product
02932	07/17/2009	Christina Fitch	Bradley J. Edwards	Jane Doe v. Roe	Attorney/Client privilege and/or work product
11544-11545	09/28/2009	Jacquie Johnson	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
07432-07435	09/25/2009	D.F.	Bradley J. Edwards	New addition to the case	Attorney/Client privilege and/or work product
06906-06909	07/17/2009	Christina Fitch	Bradley J. Edwards	Jane Doe v. Roe	Attorney/Client privilege and/or work product
06913-06914	06/22/2009	Bradley J. Edwards	Susan K. Stirling	Jane Doe v. Roe	Attorney/Client privilege and/or work product
06030-06031	05/04/2009	Susan K. Stirling	Bradley J. Edwards	Espina – Walmart case	Attorney/Client privilege and/or work product
05646	07/08/2009	Bradley J. Edwards	William J. Berger	Client meeting	Attorney/Client privilege and/or work product
05573	09/18/2009	Mike Fisten	Bradley J. Edwards	Client meeting	Attorney/Client privilege and/or work product
05540	07/31/2009	Amy Swan	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
05273-05276	07/28/2009	Amy Swan	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
05264	07/27/2009	Amy Swan	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
05267-05270	07/27/2009	Amy Swan	Bradley J. Edwards	Client info	Attorney/Client privilege and/or work product
02933	06/17/2009	Bradley J. Edwards	M. G.	Jane Doe v. Roe	Attorney/Client privilege and/or work product
01292	09/18/2009	Bradley J. Edwards	M.G.	Epstein article	Attorney/Client privilege and/or work product
01068-01070	04/02/2009	All Staff	Robin T. Kempner	Current case list of Brad Edwards	Attorney/Client privilege and/or work product
01054-01055	04/02/2009	All Staff	Robin T. Kempner	Updated case list for Brad Edwards	Attorney/Client privilege and/or work product
01033	05/06/2009	Susan K. Stirling	Bradley J. Edwards	case list	Attorney/Client privilege and/or work product
01030-01031	04/03/2009	Bradley J. Edwards	Robin T. Kempner	Case number assignments	Attorney/Client privilege and/or work product

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01118-01120	09/22/2009	Bradley J. Edwards	MG	Jane Doe v. Roe	Attorney/Client privilege and/or work product
01986-01989	04/02/2009	Bradley J. Edwards	Robin T. Kempner	Conflict check	Attorney/Client privilege and/or work product
01984-01985	04/02/2009	Bradley J. Edwards	Robin T. Kempner	Conflict check	Attorney/Client privilege and/or work product
25925	09/30/2009	All Staff	Robin T. Kempner	Conflict check	Attorney/Client privilege and/or work product
25874	09/30/2009	All Staff	Robin T. Kempner	Additional name added to conflict check	Attorney/Client privilege and/or work product
08356-08357	09/16/2009	Bradley Edwards	NR	Client Meeting	Attorney/Client privilege and/or work product
16760-16761	09/23/2009	Bradley Edwards	Jacquie Johnson	New Client	Attorney/Client privilege and/or work product
08005	06/05/2009	Bradley Edwards	MG	New Client	Attorney/Client privilege and/or work product
06915-06920	06/17/2009	MG	Bradley Edwards	Jane Doe v. Roe	Attorney/Client privilege and/or work product
08360-08363	09/16/2009	NR	Bradley Edwards	Client Meeting	Attorney/Client privilege and/or work product
04101-04107	09/28/2009	Bradley Edwards	MG	Jane Doe v. Roe	Attorney/Client privilege and/or work product
04708-04710	09/18/2009	Bradley Edwards	MG	Epstein Article	Attorney/Client privilege and/or work product
06910-06912	06/17/2009	MG	Bradley Edwards	Jane Doe v. Roe	Attorney/Client privilege and/or work product
07909	08/10/2009	Jane Doe	Bradley Edwards	Same silver car tag	Attorney/Client privilege and/or work product
07637-07642	09/10/2009	Bradley Edwards	NR	NR Interview	Attorney/ Client Privilege
06795-06799	08/19/2009	Anthony P	Bradley Edwards	Client Meeting	Attorney/Client privilege and/or work product
06542-06548	09/15/2009	Bradley Edwards	Pat Diaz	Client Meeting	Attorney/Client privilege and/or work product
06404-06408	09/10/2009	Bradley Edwards	Pat Diaz	NR Interview	Attorney/Client privilege and/or work product
08338-08339	09/16/2009	Bradley Edwards	NR	New Client	Attorney/Client privilege and/or work product
08505	09/14/2009	NR	Bradley Edwards	New Client Meeting	Attorney/Client privilege and/or work product
02241-02242	05/28/2009	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02243-02244	07/07/2009	Bradley Edwards	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02238-02240	05/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02204	07/14/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
02298-02299	07/08/2009	Bradley Edwards	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02291	06/04/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02442-02443	08/17/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02440-02441	10/02/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04318-04321	09/24/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05111	06/02/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05152	06/03/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05164	06/03/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05166	06/03/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05169-05170	06/03/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05173-05174	06/03/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05212-05213	06/23/2009	Confidential Source	Bradley Edwards	Secret Plea Deal for Epstein Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05215-05217	06/23/2009	Confidential Source	Bradley Edwards	Secret Plea Deal of Epstein providing new witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05175-05189	07/02/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05194-05196	06/23/2009	Bradley Edwards	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05204-05206	06/23/2009	Bradley Edwards	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05227-05228	07/08/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05230-05231	07/08/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05303	08/06/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05344-05346	06/23/2009	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05408	07/06/2009	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05425-05429	05/28/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05433-05436	05/29/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05433-05436	05/29/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05446	07/07/2009	Bradley Edwards	Confidential Source	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05452-05464	05/29/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05535-05536	07/30/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05538-05539	07/30/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05550-05551	08/11/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05577-05578	08/22/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05619-05620	09/18/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05650	08/06/200	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05688-05689	0/28/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
05693-05695	05/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05698	08/21/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05706-05709	05/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05720-05721	05/29/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05738-05739	05/29/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05743-05745	05/29/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05754	08/03/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05759-05762	06/01/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05765-05768	06/23/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05771-05773	06/03/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05777-05779	06/03/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05784-05786	06/03/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05791-05794	06/03/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05803	07/22/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05836-05837	07/08/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05842-05843	07/08/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05848	07/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05852-05853	07/29/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05857-05858	07/31/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05952-05953	08/25/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06192-06197	06/23/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06198-06201	06/24/2009	Confidential Source	Bradley Edwards	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06203	07/23/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06401	09/23/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06643-06651	09/17/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06788-06789	09/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06942-06943	09/26/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06953	08/14/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06955-06957	10/02/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06959-06961	08/11/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06963-06980	08/11/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06986-06989	10/03/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07010-07014	10/04/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					discovery of admissible evidence
07017-07018	09/04/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07143-07144	10/01/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07147-07150	09/18/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
075089-07513	10/13/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07605-07615	09/07/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07646-07647	09/08/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07674-07697	09/08/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08376	10/04/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08380	09/18/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08427-08430	09/24/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08450	05/17/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
08507	10/03/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
10092-10098	08/31/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01610	06/03/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01612	06/04/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01451-01458	05/27/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01608	07/03/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01606	07/02/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01510	08/25/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01506	08/24/2009	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01493	08/10/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01488	08/03/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01486	07/28/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01483	07/28/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01479	07/22/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01449	05/22/2009	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01433	10/20/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
15207-15208	08/14/2009	Jacquie Johnson	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19716-19719	09/25/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19730-19731	10/02/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01683	08/06/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01693	08/21/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03011	09/17/2009	Bradley Edwards	Confidential Source	Additional Information RE:	W/P Priv.; not reasonably calculated to lead to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				Epstein Molestations	discovery of admissible evidence
01755-01756	10/02/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01756	06/22/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01770	10/08/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03126	09/18/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02006	06/23/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02060	09/23/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03487-03494	09/19/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02269	08/26/2009	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02322-02323	10/16/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02595-02596	09/07/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02866-02867	09/25/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02895	08/31/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02901	09/16/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03032	09/18/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03057	10/13/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03070	07/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
03081-03082	09/21/2009	Bradley Edwards	Confidential Source	Providing Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03144	10/08/2009	Confidential Source	Bradley Edwards	Providing Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03189-03190	10/14/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Strategies	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04015	09/08/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02913	09/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02956-02957	08/31/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02975	10/21/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04031-04055	08/12/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04057	08/11/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04060	08/12/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02979-02980	10/02/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02998	07/21/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05626	10/12/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05630-05631	10/12/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05664-05665	10/12/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
07976	08/14/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
06655	06/09/2009	Confidential	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Source			discovery of admissible evidence
19986-19987	09/28/2009	Confidential Source	Mike Fisten	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04905-04906	07/15/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
04946-04951	10/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05148	05/22/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05151	05/26/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05161	05/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05203	06/23/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05207-05208	06/23/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05220-05221	06/23/2009	Confidential Source	Bradley Edwards	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05224-05225	06/24/2009	Confidential Source	Bradley Edwards	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05239	06/23/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05277-05278	06/23/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05324-05325	06/23/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05368-05369	06/23/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
05387-05388	06/23/2009	Bradley Edwards	Confidential Source	Secret Plea Deal For Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
02811-02812	10/03/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01280-01288	09/18/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
01131-01134	10/08/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
00988	04/25/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10163-10167	08/12/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10181-10188	08/12/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10245-10251	09/08/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10364-10367	09/17/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10586-10591	09/24/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10625-10632	10/02/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10698-10699	10/13/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10718-10719	10/13/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10927-10937	05/28/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10945-10954	05/29/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10964-10978	06/02/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10991	06/22/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11006-11010	06/23/2009	Bradley Edwards	Confidential Source	Additional Information RE:	W/P Privilege; Not reasonably calculated to lead

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				Epstein Molestations	to discovery of admissible evidence.
11075-11076	07/29/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11080-11082	07/31/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11085-11097	09/04/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11123-11136	09/17/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11140-11142	10/04/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11150-11151	10/12/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
10390-10393	09/19/2009	Bradley Edwards	Confidential Source	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11157-11165	10/25/2009	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11170-11174	06/23/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11184-11185	05/27/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11188-11195	05/28/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11198-11200	05/28/2009	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11208-11214	05/29/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11223-11236	06/01/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11260-11266	06/24/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11320-11325	07/30/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
11372-11373	08/11/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11380-11383	08/12/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11438-11442	09/17/2009	Confidential Source	Bradley Edwards	Additional Information RE: Epstein Molestations	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11549-11550	10/01/2009	Confidential source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
11574-11579	10/13/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Privilege; Not reasonably calculated to lead to discovery of admissible evidence.
BOX 2					

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
08029-08032	09/14/2009	Bradley Edwards	Tami Wolfe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08026-08028	05/01/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07738-07739	05/13/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07747	09/17/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07758-07759	05/05/2009	Jonathan Birkman	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
07760-07765	09/11/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07766	10/11/2009	Jacquie Johnson	Attorneys at RRA	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07767-07784	05/01/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07785-07790	06/26/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07791	04/04/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07792-07793	04/01/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07794-07841	04/04/2009	Paul Cassell	Bradley Edwards	Full draft of motion to stay	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07842-07848	06/16/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privacy rights
07849-07852	04/10/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07853-07856	06/10/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07857-07862	09/11/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07863-07864	06/10/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07685-07874	05/14/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07875-07876	04/14/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07877-07884	08/03/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07886-07888	08/02/2009	Cara Holmes	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
07889-07892	05/01/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07893-07904	07/27/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07905-07908	07/22/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07910-07912	08/10/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07916	10/16/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07919	08/27/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
07920-07930	10/18/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05399	10/17/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05355-05357	09/09/2009	Russell Adler	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05375-05378	09/10/2009	Jacquie Johnson	Bradley Edward	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05372	04/20/2009	Marc Nurik	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05380-05381	09/11/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05384-05385	09/15/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05348	09/15/2009	Bradley Edwards	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05341	09/04/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05329-05330	04/09/2009	Beth Williamson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05332-05333	05/20/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
05320-05323	07/30/2009	Bradley Edwards	Amy Swan	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05312-05313	07/22/2009	Nora Batian	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05306-05307	07/22/2009	Nora Batian	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05302	07/22/2009	Attorney at RRA	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05281	08/03/2009	Bradley Edwards	Mike Fisten	Review of litigation materials	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05282-05283	04/09/2009	Beth Williamson	Bradley Edwards	Jane Doe v. Us	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05288-05291	07/22/2009	Bradley Edwards	William Berger	Dr. Swan	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05292	07/22/2009	Attorneys at RRA	Ken Jenne	RE: Epstein Meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
05295-05297	07/23/2009	Attorneys at RRA	Priscilla Nascimento	RE: Epstein Conference Room Reserved	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05298	08/03/2009	Mike Fisten	Bradley Edwards	Discussion of Epstein strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05261	07/23/2009	Amy Swan	Bradley Edwards	Victim Psychological Assessment	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18358-18359	07/24/2009	Bradley Edwards	Ken Jenne	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04431-04432	08/14/2009	Jacquie Johnson	Bradley Edwards	RE: Epstein-Maxwell Subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04419-04420	04/09/2009	Bradley Edwards	Paul Cassell	RICO Statement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04403-04416	10/17/2009	Paul Cassell	Bradley Edwards	Punitive Damages	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04387-04402	08/19/2009	Paul Cassell	Bradley Edwards	Victim Complaints, Forensic accountants, & Epstein's Fraudulent Transfers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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01082	09/02/2009	Jacquie Johnson	Mike Fisten	Subpoenas for Epstein's Housekeepers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04363	09/14/2009	Jacquie Johnson	Bradley Edwards	LM	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04343-04344	09/04/2009	Bradley Edwards	Jacquie Johnson	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04340-04342	09/04/2009	Jacquie Johnson	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04339	09/03/2009	Mike Fisten	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
00989	09/04/2009	Bradley Edwards	William Berger	Alessi Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04325-04328	07/30/2009	Paul Cassell	Bradley Edwards	RE: Epstein- beneficiaries & response to asset freeze motion	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
00155	06/25/2009	Bradley Edwards	Paul Cassell	20 Cases & Bond	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04312-04313	05/26/2009	Bradley Edwards	Paul Cassell	RE: Epstein Accounting; Freezing	W/P; Attorney Client Privilege; Irrelevant and

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				Assets	not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04314-04317	09/11/2009	Paul Cassell	Bradley Edwards	RE: Epstein- Add to our motion for a protective order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04307-04308	04/08/2009	Bradley Edwards	Paul Cassell	Motion to stay-response & motion to unseal Fed Civil Case	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04309-04311	05/26/2009	Paul Cassell	Bradley Edwards	Epstein Assets & Forensic Accounting	
04295	09/11/2009	Jacquie Johnson	Bradley Edwards	thoughts on Epstein's Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04305-04306	04/08/2009	Paul Cassell	Bradley Edwards	Motion to Strike references to the NPA & Revised response to the motion to stay	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04274-04276	05/06/2009	William Berger	Bradley Edwards	Sandy Berger Telephone call	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18334-18336	07/24/2009	Ken Jenne	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04216-04219	09/08/2009	William Berger	Bradley Edwards	State Judge ordered no contact with any underage girl	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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04202-04206	09/08/2009	Bradley Edwards	William Berger	Epstein's attorneys & Bob Josephsberg have filed several motions on limits of the no contact order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04207-04215	09/04/2009	Attorneys at RRA	Paul Cassell	Letter to Critton RE: Protective Order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04191-04193	09/04/2009	Paul Cassell	William Berger	Finding out who is protected by the order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04194-04195	09/04/2009	Attorneys at RRA	Steven Jaffe	Seek Court Intervention	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04196-04199	09/08/2009	Bradley Edwards	William Berger	Finding out who is protected by the order	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25937	10/25/2009	Scott Rothstein	Ken Jenne	Epstein's house staff	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25923	09/09/2009	Attorneys at RRA	Maribel Matiska	legal opinion RE: Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25832-25838	06/01/2009	Bradley Edwards	William Berger	contact Information re: who is pertinent to the case	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25825-25826	10/05/2009	Bradley Edwards	William Berger	Trial Prep Epstein	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19649-19651	07/24/2009	Bradley Edwards	Ken Jenne	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19658-19661	08/03/3009	Bradley Edwards	Ken Jenne	Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25809-25810	10/04/2009	William Berger	Bradley Edwards	Trail Prep	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04466-04469	08/18/2009	Bradley Edwards	Paul Cassell	Epstein Assets Subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01296	10/02/2009	Mike Fisten	Michael Wheeler	Subpoena of Detective Recarey	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04439-0442	09/16/2009	Bradley Edwards	Paul Cassell	RE: Epstein-Notice Of IME	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04445	07/31/2009	Jacque Johnson	Bradley Edwards	RE:Epstein Reminder-Mon 8/3/09-Monthly Call in Telephone Conference	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04425-04428	09/18/2009	Paul Cassell	Bradley Edwards	Jane Doe Depo Set for the 30 th	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
04429	10/07/2009	Bradley Edwards	Paul Cassell	Motion for Sanctions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25770-25772	10/05/2009	William Berger	Bradley Edwards	Victims for Trial	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25768-25769	10/05/2009	Bradley Edwards	William Berger	Victims for Trail	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
26716-26717	09/04/2009	Mike Fisten	Ken Jenne	NR as a victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
26714-26715	10/13/2009	Attorneys at RRA	Russell Adler	Trial date procured	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20907-20908	10/05/2009	Bradley Edwards	William Berger	Victims for Trial	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19857-19860	10/17/2009	Mike Fisten	Pat Roberts	Epstein's Palm Beach Property	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19861-19862	10/23/2009	Paul Cassell	Bradley Edwards	Larry Visoski Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
19713-19715	09/09/2009	Bradley Edwards	Jacquie Johnson	Copperfield Subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19720-19729	09/30/2009	Mike Fisten	Jacquie Johnson	Tentative Subpoena dates and people list	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19706-19707	09/09/2009	Bradley Edwards	Jacquie Johnson	Dershowitz Subpoena ready to be signed	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19693-19695	09/04/2009	Mike Fisten	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19696-19697	09/04/2009	Jacquie Johnson	Bradley Edwards	Setting Up Depo Times	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19698-19700	09/04/2009	Mike Fisten	Bradley Edwards	Investigation in Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19685-19688	08/27/2009	Bradley Edwards	Ken Jenne	RE: Witness information that we need to use	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19689-19690	09/02/2009	Mike Fisten	Jacquie Johnson	Awaiting dates for the 2 other pilots, Dershowitz & Copperfield	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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19691-19692	09/02/2009	Mike Fisten	Pat Diaz	Bill Riley Subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19673-19674	08/10/2009	Jacquie Johnson	Bradley Edwards	Depo List	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19654-19655	08/03/2009	Mike Fisten	Bradley Edwards	Setting Up Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19656-19657	08/03/2009	Mike Fisten	Bradley Edwards	List of people to subpoena	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19662-19663	08/03/2009	Mike Fisten	Bradley Edwards	Setting Up Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19652-19653	08/26/2009	Jacquie Johnson	Bradley Edwards	Witness information that we need to use	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18348-18349	08/27/2009	Bradley Edwards	Ken Jenne	RE: Witnesses information that we need to use	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04272	06/30/2009	William Berger	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19683-19684	08/19/2009	Mike Fisten	Pat Diaz	Potential New Witnesses	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
19856	10/17/2009	Mike Fisten	Mike Fisten	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20888	09/12/2009	Russell Adler	Bradley Edwards	Potential New witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20946	05/11/2009	Attorneys at RRA	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05807-05810	07/23/2009	Attorneys at RRA	Priscila Nascimento	Conference room reserved	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05262-05263	07/22/2009	Bradley Edwards	Jacque Johnson	Investigator information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25829	05/11/2009	Bradley Edwards	William Berger	Motion to unseal criminal records	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25830-25831	05/11/2009	Attorneys at RRA	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25811-25813	05/11/2009	Attorneys at RRA	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
25815-25822	06/01/2009	William Berger	Bradley Edwards	Depo information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18358-18359	07/24/2009	Bradley Edwards	Ken Jenne	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05382	09/12/2009	Bradley Edwards	Mike Fisten	Potential new witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08033-08070	10/23/2009	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25997	10/23/2009	Scott Rothstein	Russell Adler	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
26741-26763	10/23/2009	Attorneys at RRA	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
25774-25777	05/12/2009	Bradley Edwards	Susan Stirling	Filed Motions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18177-18179	08/24/2009	Ken Jenne	Bradley Edwards	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
18174-18176	08/24/2009	Ken Jenne	Mike Fisten	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18172-18173	08/24/2009	Mike Fisten	Bradley Edwards	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18170	08/24/2009	Bradley Edwards	Mike Fisten	Epstein Probation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03106	06/03/2009	Bradley Edwards	Shawn Gilbert	Epstein Case Info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02593-02594	05/13/2009	Bradley Edwards	Shawn Gilbert	Discussion with secretary regarding client information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08014	Undated	Unknown Staff	Bradley Edwards	Miscellaneous case info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
27494	10/23/2009	Attorneys at RRA	Mike Fistos	Legal Research RE: Causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18166-18167	08/04/2009	Bradley Edwards	Mike Fisten	Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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18164-18165	08/03/2009	Bradley Edwards	Mike Fisten	Copperfield Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18771-18773	04/27/2009	Marc Nurik	Bradley Edwards	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18742-18744	09/10/2009	Jacquie Johnson	Bradley Edwards	Dershowitz Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
18737-18741	09/10/2009	Jacquie Johnson	Bradley Edwards	Depo technicalities	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20263-20282	10/14/2009	Pat Roberts, Mike Fisten	Ronald Wise	Vehicle Registrations-Visoski	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
20219-20262	10/14/2009	Pat Roberts, Mike Fisten	Ronald Wise	Visoski Research & Questions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
17225-17230	07/22/2009	Bradley Edwards	Jacquie Johnson	Wayne Black Retainer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
17038-17040	10/29/2009	Cara Holmes	Jacquie Johnson	RE: Subpoenas for Epstein's attorneys	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16916-16928	10/19/2009	Bradley Edwards	Jacquie Johnson	Witness List	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16795-16796	10/01/2009	Bradley Edwards	Jacque Johnson	Trump Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16455-16759	09.10/2009	Bradley Edwards	Jacque Johnson	Depo Dates	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16436-16437	09/09/2009	Bradley Edwards	Jacque Johnson	Dershowitz Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16400-16404	09/02/2009	Mike Fisten	Jacque Johnson	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
16394-16395	08/31/2009	Bradley Edwards	Jacque Johnson	Depo Dates	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01046	08/25/2009	Cara Holmes	Bradley Edwards	Computer information	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01048-01050	07/28/2010	William Berger	Bradley Edwards	Hard drive of Plaintiff's computer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01052	09/09/2009	Attorneys at RRA	Maribel Matiska	legal Opinion RE: Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
01100	10/19/2009	Russell Adler	Bradley Edwards	Dershowitz Involvement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01105	08/11/2009	Bradley Edwards	Alan Garten	Potential New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01111	05/13/2009	Bradley Edwards	Paul Cassell	Legal research	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01112-01117	05/12/2009	Bradley Edwards	William Berger	Dr. Swan	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01139-01142	04/29/2009	Staff	Bradley Edwards	Epstein Depo revised	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01151	09/11/2009	Beth Williamson	Bradley Edwards	Motion for protective order final draft	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01167	09/11/2009	Bradley Edwards	Jacque Johnson	Epstein MPO	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01216	05/21/2009	Bradley Edwards	William Berger	Immunity for testimony about prostitution	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
01247	09/30/2009	Bradley Edwards	Jacque Johnson	Therapy Notes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01268-01269	10/22/2009	Bradley Edwards	Marc Nurik	Epstein meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01293	08/19/2009	Ken Jenne	Bradley Edwards	Epstein Assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01299	04/21/2009	Bradley Edwards	Carolyn Edwards	Order denying the motion to reassign or transfer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01305	08/24/2009	Paul Cassell	Bradley Edwards	Epstein Computers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01313	09/02/2009	Attorneys at RRA	Jacque Johnson	Epstein Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01333	08/03/2009	Jacque Johnson	Bradley Edwards	Epstein Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01335	08/03/2009	Mike Fisten	Bradley Edwards	Investigation into Epstein planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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01337	08/10/2009	Jacquie Johnson	Bradley Edwards	Epstein Depo list	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01363	09/08/2009	Ken Jenne	Bradley Edwards	Motion to freeze assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01414-01416	98/18/2009	Bradley Edwards & Ken Jenne	Mike Fisten	Epstein Potential Witness List	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01417	08/24/2009	Mike Fisten	Bradley Edwards	Potential Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01429	09/09/2009	Attorneys at RRA	Bradley Edwards	Epstein telephone conference today	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01431	07/31/2009	Jacquie Johnson	Bradley Edwards	Epstein case info	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01432	09/15/2009	Bradley Edwards	Pat Diaz	New Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01434	10/19/2009	Marc Nurik	Bradley Edwards	Epstein Evidence	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01461	04/27/2009	Marc Nurik	Bradley Edwards	Epstein Info	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01466	07/31/2009	William Berger	Bradley Edwards	Epstein Presentation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01471	07/18/2009	Wayne Black	Bradley Edwards	Investigation into Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01480	07/22/2009	Attorneys at RRA	Bradley Edwards	Epstein Meeting	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01482	07/24/2009	Ken Jenne	Bradley Edwards	Investigation into Epstein planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01491	08/10/2009	Ken Jenne	Bradley Edwards	Investigative fees	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01492	08/10/2009	Jacquie Johnson	Bradley Edwards	The Mar-a-Lago Club Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01495	08/11/2009	Marc Nurik	Bradley Edwards	Potential Witness	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01498	08/17/2009	Marc Nurik	Bradley Edwards	Legal opinion re: Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
01502	08/21/2009	Marc Nurik	Bradley Edwards	Epstein Evidence	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01513	08/25/2009	Jacquie Johnson	Bradley Edwards	Discovery for the girls	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01522	08/14/2009	Bradley Edwards	Marc Nurik	Legal opinion	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01522	10/08/2009	Ken Jenne	Bradley Edwards	New Victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01523-01524	10/26/2009	Marc Nurik	Bradley Edwards	Meeting on Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01527	04/27/2009	Marc Nurik	Bradley Edwards	New Victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01540	05/01/2009	William Berger	Bradley Edwards	Litigation Strategy on punitive damages	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01553	09/10/2009	Bradley Edwards	Jacquie Johnson	Letter from JP Morgan Chase	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
01566	05/11/2009	Wayne Black	Bradley Edwards	New Victim	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01586	05/26/2009	Paul Cassell	Bradley Edwards	Opposition to the continuance of the trial date	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
15690-15691	10/01/2009	Jacquie Johnson	Bradley Edwards	Trump Depo	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01607	10/17/2009	Paul Cassell	Bradley Edwards	Litigation Strategy on motions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01621	04/19/2009	Marc Nurik	Bradley Edwards	Potential New Witness	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01622	06/09/2009	Susan Stirling	Bradley Edwards	Important phone call due today	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01624	06/11/2009	Robert Buschel	Bradley Edwards	Motion for bond asset transfer	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01627	05/06/2009	Bradley Edwards	Marc Nurik	Dateline interest into epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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01628	06/15/2009	Robert Buschel	Bradley Edwards	Investigations	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01635	05/21/2009	Bradley Edwards	Carolyn Edwards	Personal Conversation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01636	06/23/2009	Susan Stirling	Bradley Edwards	Motion to unseal	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01638	06/29/2009	Paul Cassell	Bradley Edwards	Litigation Strategy RE: Motion to unseal	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01644	07/06/2009	Confidential Source	Bradley Edwards	Request for admission	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01646	07/06/2009	Confidential Source	Bradley Edwards	Secret Plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01648	07/11/2009	Wayne Black	Bradley Edwards	Investigating Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01650	07/13/2009	Carl Linder	Bradley Edwards	Epstein's Assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01658-01659	07/18/2009	Paul Cassell	Bradley Edwards	DOJ	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01663	07/18/2009	Mike Fisten	Bradley Edwards	Epstein's cars	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01668	07/29/2009	Bradley Edwards	Wayne Black	Sarah Kellen number	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01764	07/31/2009	Bradley Edwards	Carolyn Edwards	Case Numbers	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01676	10/17/2009	Paul Cassell	Bradley Edwards	Motions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01681	08/03/2009	Mike Fisten	Bradley Edwards	Positing regarding litigation preparation	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01682	09/04/2009	Paul Cassell	Bradley Edwards	Litigation Strategy-Order 242	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01684	09/11/2009	Jacque Johnson	Bradley Edwards	Plaintiff firms the notices of depositions	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01686	09/11/2009	Mike Fisten	Bradley Edwards	Potential new witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
01692	09/12/2009	William Berger	Bradley Edwards	Proposal for settlement	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01698	05/05/2009	Paul Cassell	Bradley Edwards	Epstein Victim Depos	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01702	09/17/2009	Paul Cassell	Bradley Edwards	Epstein Depos	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01705	05/14/2009	William Berger	Bradley Edwards	Statutory Rape	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01711	04//01/2009	Carolyn Edwards	Bradley Edwards	Third party subs	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01737	07/14/2009	Richard Wolfe	Bradley Edwards	Facebook/Myspace	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01564	05/11/2009	Attorneys at RRA	Bradley Edwards	Investigation Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01603	10/15/2009	Bradley Edwards	Adam Horowitz	Testimony RE: Vehicles	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
01742	10/12/2009	Beth Williamson	Bradley Edwards	Filing fee check	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01743	10/29/2009	Beth Williamson & Jacquie Johnson	Bradley Edwards	New folder for Jane Doe Created	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
01745	10/15/2009	Bradley Edwards	Paul Cassell	Epstein's Cars	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05726	08/14/2009	Bradley Edwards	William Berger	Legal opinion	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
27395	08/13/2009	Marc Nurik	Scot Rothstein	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
26356	08/13/2009	Scott Rothstein	Russell Adler	Legal Research RE: causes of action against Epstein	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04225	06/15/2009	Bradley Edwards	Wayne Black	Epstein Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04229-04233	06/16/2009	Wayne Black	Bradley Edwards	Epstein secret plea deal with Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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04237-04242	06/15/2009	Bradley Edwards	Wayne Black	Epstein secret plea deal with Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04246	06/15/2009	Wayne Black	Bradley Edwards	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04250	06/15/2009	Wayne Black	Bradley Edwards	Epstein Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04255-04256	06/15/2009	Wayne Black	Bradley Edwards	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04260	06/15/2009	Bradley Edwards	Wayne Black	Epstein secret plea deal for Bear Stearns	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04523	05/14/2009	Bradley Edwards	Wayne Black	Investigating Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05088-05090	10/27/2009	Attorneys at RRA	Ken Jenne	Epstein's assets	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05108	04/01/2009	Bradley Edwards	Carolyn Edwards	Victims employment	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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05145	05/21/2009	Bradley Edwards	Carolyn Edwards	Epstein Hearing	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
05237	07/20/2009	Wayne Black	Bradley Edwards	Investigating Epstein's planes	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02648-02650	08/10/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02651	07/29/2009	Bradley Edwards	Wayne Black	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02661-02662	05/12/2009	Russell Adler	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02674-02677	08/18/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02678-02679	04/10/2009	Russell Adler	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02682-02683	08/10/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02718-02720	06/25/2009	Bradley Edwards	Seth Lehman	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02728-02729	08/04/2009	Bradley Edwards	Spencer Kuvin	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02746	07/22/2009	Bradley Edwards	Adam Steinberg	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02813-02814	08/26/2009	Bradley Edwards	Pat Diaz	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02817-02826	08/04/2009	Bradley Edwards	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02827-02832	05/12/2009	Attorneys at RRA	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02833-02835	08/23/2009	Bradley Edwards	Pat Diaz	Other Rape Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02874-02876	05/23/2009	Bradley Edwards	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02887-02888	08/26/2009	Bradley Edwards	Pat Diaz	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
02889-02890	10/14/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02891	10/12/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02892	08/03/2009	Bradley Edwards	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02894	09/09/2009	Mike Fisten	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02899	09/29/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03001-03002	05/15/2009	Susan Stirling	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03003	04/15/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03004	06/23/2009	Wayne Black	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
03005-03006	08/03/2009	Mike Fisten	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03007	10/07/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03008	04/23/2009	Susan Stirling	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03013	05/25/2009	Bradley Edwards	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03014	10/08/2009	Bradley Edwards	Cara Holmes	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03015	04/24/2009	Steven Jaffe	Susan Stirling	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03017-03018	08/18/2009	Mike Fisten	Bradley Edwards	Providing New witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03019	09/19/2009	Bradley Edwards	Pat Diaz	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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03020	09/16/2009	Bradley Edwards	Jacquie Johnson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03021-03027	09/19/2009	Bradley Edwards	Pat Diaz	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03031-03034	09/18/2009	Pat Diaz	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03035	09/29/2009	Russell Adler	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03039	06/05/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03040	09/04/2009	Mike Fisten	William Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03044	09/09/2009	Bradley Edwards	Jacquie Johnson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03045-03047	09/30/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03048	04/21/2009	Paul Cassell	Susan Stirling	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03050-03052	10/16/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03053	10/17/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03054	10/13/2009	Attorneys at RRA	Grant Smith	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03056	09/04/2009	Bradley Edwards	Mike Fisten	Other Rape Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03072	06/22/2009	Bradley Edwards	Wayne Black	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03073	09/01/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03074-03075	10/28/2009	Jacque Johnson	Michael Wheeler	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03100	10/15/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
03102-03103	07/21/2009	Bradley Edwards	Paul Cassell	Other Rape Victims	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03107-03113	07/24/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03114	08/04/2009	Bradley Edwards	Mike Fisten	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03115-03118	05/16/2009	Bradley Edwards	Susan Stirling	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03124	06/23/2009	Bradley Edwards	Wayne Back	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03125	09/08/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03127-03128	05/19/2009	Susan Stirling	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03135-03136	08/04/2009	Mike Fisten	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
03137	08/22/2009	Wayne Black	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03138	10/08/2009	Beth Williamson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03145	10/30/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03146	08/22/2009	Bradley Edwards	Wayne Black	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03147-03154	10/07/2009	Bradley Edwards	Beth Williamson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03155-03155	10/08/2009	Bradley Edwards	Jacquie Johnson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03158—3159	04/28/2009	Bradley Edwards	Susan Stirling	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03191-03196	10/14/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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03197-03199	08/14/2009	Attorneys at RRA	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03205-03211	09/13/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03212	08/11/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03213	10/28/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03214-03218	10/27/2009	Paul Cassell	Ronald Wise	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03223-03232	04/15/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03233-03242	09/28/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03245	06/01/2009	William Berger	Bradley Berger	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03251-03252	09/24/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03303	07/30/2009	Bradley Edwards	Beth Williamson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03306-03307	09/04/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03308-03309	09/04/2009	Beth Williamson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03310-03314	09/04/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03389	07/30/2009	Beth Williamson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03392-03393	09/04/2009	Bradley Williamson	Beth Williamson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03461-03463	09/19/2009	Bradley Edwards	Susan Stirling	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03464-03465	06/14/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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					discovery of admissible evidence; protected by privacy rights
03469-03486	06/15/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03495	08/27/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03496-03501	10/28/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03502-03506	10/27/2009	Paul Cassell	Ronald Wise	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03507-03510	10/28/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03511-03513	10/28/2009	Bradley Edwards	Ronald Wise	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03514-03516	10/26/2009	Paul Cassell	Ronald Wise	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03520-03523	07/04/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by

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					privacy rights
03524	09/04/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03525-03530	09/05/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03532	08/24/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03536	07/19/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03539-03540	08/26/2009	Pat Diaz	Bradley Edwards	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03541-03544	10/12/2009	Attorneys at RRA	Ronald Wise	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03545-03547	06/26/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03548-03549	04/11/2009	Wayne Black	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights

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03550-03574	09/09/2009	Attorneys at RRA	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03575-03588	10/19/2009	Kendall Coffey	Bradley Edwards	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03589-03604	04/11/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03605-03606	10/16/2009	Attorneys at RRA	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03607-03610	10/16/2009	William Berger	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03611-03612	10/16/2009	Attorneys at RRA	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03613-03615	10/29/2009	Bradley Edwards	Cara Holmes	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03616-03618	10/01/2009	Pat Diaz	Bradley Edwards	Providing New Witnesses	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03628-03637	09/15/2009	Jacquie Johnson	Bradley Edwards	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and

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					not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
03638-03641	09/08/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08454	10/23/2010	Attorneys at RRA	Mark Fistos	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08118-08123	10/23/2009	Attorneys at RRA	Russell Adler	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
08124-08156	10/23/2009	Attorneys at RRA	Steven Jaffe	Litigation Strategy	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
02411-02413	05/12/2009	Attorneys at RRA	Bradley Edwards	J. Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01913-01914	06/15/2009	Susan K. Stirling	Bradley Edwards	J. Activity in case 9:08-cv-80893-KAM Doe v. Epstein Motion to Dismiss	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01918- 01919	04/15/2009	Attorneys at RRA	Bradley Edwards	J. Activity in case 9:08-cv-80893-KAM Doe v. Epstein Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01920-01924	05/20/2009	Paul Cassell	Bradley Edwards	J. Activity in case 9:08-cv-80994-KAM Jane Doe No. 6 v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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				Motion to Strike	to the discovery of the admissible evidence; protected by privacy rights
01925	08/26/2009	Jacquie Johnson	Bradley Edwards J.	Adriana Surveillance/Interview	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01928-01929	08/03/2009	Jacquie Johnson	Bradley Edwards J.	Alfredo Rodriguez address	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01930	09/05/2009	Bradley Edwards J.	William J. Berger	Client info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01940	09/10/2009	Russell Adler	Bradley Edwards J.	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01944-01952	04/10/2009	Russell Adler	Bradley Edwards J.	Epstein assets	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01969	05/04/2009	Susan K. Stirling	Bradley Edwards J.	Call from sources of information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01971-01972	05/13/2009	Attorneys at RRA	Bradley Edwards J.	Cassell Draft	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01973-01974	07/23/2009	Mike Fisten	Bradley Edwards J.	CMA vs. Epstein -- new investigator info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
01975	08/10/2009	Jacquie Johnson	Bradley Edwards J.	Computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01976-01978	07/06/2009	Bradley Edwards J.	Paul Cassell	Conference Call	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01981-01982	04/01/2009	Bradley Edwards J.	Russell Adler	Conflict check for Brad Edwards files	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01990	05/14/2009	Bradley Edwards J.	Paul Cassell	Consolidation order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02000	09/03/2009	Jacquie Johnson	Bradley Edwards J.	Dates for Subpoena – Epstein's housekeepers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02001-02003	10/09/2009	Jacquie Johnson	Bradley Edwards J.	David Copperfield	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02009-2010	09/09/2009	Pasquale Diaz	Bradley Edwards J.	Deposition of Bill Riley	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02017-02018	05/18/2009	William J. Berger	Bradley Edwards J.	Doe v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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02023	05/14/2009	Attorneys at RRA	Bradley Edwards J.	Sid's deposition of Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02045-02046	09/04/2009	Attorneys at RRA	Bradley Edwards J.	E.W., L.M. Doe v. Epstein – Letter from Bob Critton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02049-02053	09/04/2009	Paul Cassell	Bradley Edwards J.	E.W., L.M. Doe v. Epstein – Letter from Bob Critton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02063-02064	05/19/2009	William J. Berger	Bradley Edwards J.	Epstein – Confirming AT&T Dial in Telephone Conference for Monday, 6/8/09 at 2:00 p.m.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02089-02090	09/17/2009	Paul Cassell	Bradley Edwards J.	Epstein hearing	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02091-02092	06/16/2009	Attorneys at RRA	Bradley Edwards J.	Epstein – Monthly Call in Telephone Conference	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02106-02108	04/29/2009	Susan K. Stirling	Bradley Edwards J.	Epstein – Telephone Conference	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02109	05/13/2009	Wayne Black	Bradley Edwards J.	Epstein info – List of Plaintiff lawyers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02110-02111	09/15/2009	Bradley J.	Jacquie Johnson	Epstein – Cancelling depositions	Work product; attorney/client privilege;

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
		Edwards		in New York for the following week	irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02112-02116	09/10/2009	Bradley J. Edwards	Jacquie Johnson	Epstein – Yearbook picture of Epstein rape victims	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02117-02118	10/23/2009	Jacquie Johnson	Bradley J. Edwards	Epstein (AUSA)	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02119-02121	09/08/2009	Beth S. Williamson	Bradley J. Edwards	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02130-02137	05/26/2009	Susan K. Stirling	Bradley J. Edwards	Epstein cases- depositions in federal cases	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02138-02139	08/04/2009	Jacquie Johnson	Bradley J. Edwards	Epstein depo – New York	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02143-02146	09/28/2009	Jacquie Johnson	Bradley J. Edwards	Epstein Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02229	05/05/2009	Paul Cassell	Bradley J. Edwards	Epstein Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02236-02337	05/20/2009	Attorneys at RRA	Bradley J. Edwards	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
02256-02257	07/22/2009	Jacquie Johnson	Bradley Edwards J.	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02260-02261	07/22/2009	Nora Batian	Bradley Edwards J.	Epstein – coordinating meetings	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02263-02265	07/23/2009	Attorneys at RRA	Nora Batian	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02266	07/30/2009	Jacquie Johnson	Bradley Edwards J.	Epstein – Video Deposition of S.K. in NY	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02273-02276	09/18/2009	Jacquie Johnson	Bradley Edwards J.	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02278-02279	07/23/2009	Priscila A. Nascimento	Nora Batian	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02284-02855	05/11/2009	Susan K. Stirling	Bradley Edwards J.	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01769	10/30/2009	Mike Fisten	Bradley Edwards J.	Barbara Berg info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
01780	09/14/2009	Bradley Edwards	J. William J. Berger	Discussion of belief that Epstein is transferring assets to avoid judgments	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01787-01788	09/04/2009	Ken Jenne	Bradley Edwards J.	1. Accountants 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01799-01801	10/14/2009	Bradley Edwards	J. Paul Cassell	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Notification of ninety days expiring	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01804-01805	09/04/2009	Beth Williamson	S. Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Order on motion for Medical Exam	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01806-01807	09/09/2009	Paul Cassell	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Motion for protective order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01808-01809	09/10/2009	Paul Cassell	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein - Order on Motion for Extension of Time to File Response/Reply/Answer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01810-01816	09/09/2009	Attorneys at RRA	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Response to Motion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01817-01818	06/11/2009	Paul Cassell	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Response to motion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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01840-01841	07/16/2009	Paul Cassell	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Order on Motion to Stay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01867-01868	09/28/2009	Paul Cassell	Bradley Edwards J.	Activity in case 9:08-cv-80119-KAM Doe v. Epstein – Notice (Other)	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03662-03663	08/10/2009	Attorneys at RRA	Bradley Edwards J.	Meeting with clients	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03664-03668	09/18/2009	Paul Cassell	Bradley Edwards J.	Litigation strategy and preparation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08166-08168	10/28/2009	Paul Cassell	Bradley Edwards J.	Weds filing	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08169-08170	08/06/2009	Bradley Edwards J.	Jacque Johnson	Wexner deposition for 14th	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08190-08196	04/07/2009	Bradley Edwards J.	Paul Cassell	Motion to unseal/Motion to stay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08265-08300	09/04/2009	Attorneys at RRA	Bradley Edwards J.	Witness Information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08377-08378	10/02/2009	Bradley J.	Paul Cassell	Zorro Trust research info.	Work product; attorney/client privilege;

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		Edwards			irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08381-08383	09/06/2009	Bradley Edwards	J. Paul Cassell	Epstein – complaint	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08384-08388	04/13/2009	Bradley Edwards	J. Paul Cassell	Epstein fraudulent transfer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08389-08397	05/14/2009	Bradley Edwards	J. Paul Cassell	Revisited sexual history memo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08401	07/22/2009	Bradley Edwards	J. Paul Cassell	Reply memo on asset transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08409-08410	08/01/2009	Bradley Edwards	J. Cara L. Holmes	Rodriguez Deposition	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08421	06/02/2009	Bradley Edwards	J. William J. Berger	Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08423-08425	10/09/2009	Bradley Edwards	J. Mike Fisten	Subpoena info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08426	08/10/2009	Bradley Edwards	J. Mike Fisten	Synopsis	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
08441-08446	10/05/2009	Attorneys at RRA	William J. Berger	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03672-03673	06/26/2009	Wayne Black	Bradley Edwards	Brunel information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03706-03718	08/05/2009	Bradley Edwards	Paul Cassell	Cf. Response to Motion to File Epstein Affidavit	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03737	08/25/2009	Bradley Edwards	Cara Holmes	Computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03746-03753	08/02/2009	Bradley Edwards	William Berger	Computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02335-02338	05/08/2009	William Berger	Bradley Edwards	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02360-02361	06/09/2009	Susan Stirling	Bradley Edwards	Hearing to Un-seal- Criminal Plea Transcript	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02368-02373	10/14/2009	Bradley Edwards	Jacquie Johnson	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
02376-02392	10/14/2009	Mike Fisten	Bradley Edwards	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02401-02410	05/08/2009	William Berger	Bradley Edwards	Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02414-02419	05/12/2009	Attorneys at RRA	Bradley Edwards	Jane Doe II v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03669-03670	10/08/2009	Carolyn Edwards	Bradley Edwards	Epstein house arrest monitor	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02288-02289	05/26/2009	Susan Stirling	Bradley Edwards	Motion date	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02292-02293	05/19/2009	Dr. Lee (Expert)	Bradley Edwards	Pimp and His Game	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02304-02308	09/17/2009	Bradley Edwards	Jacquie Johnson	Forensics/Investigations	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02313-02316	07/01/2009	Bradley Edwards	William Berger	Confidential Agreement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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02331-02334	05/08/2009	Susan Stirling	Bradley Edwards	Critton order Transcript	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02173	09/04/2009	Attorneys at RRA	Mike Fisten	Epstein Juan Alessi	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02187	07/26/2009	Bradley Edwards	Wayne Black	Epstein matter	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02195-02197	09/17/2009	Jacquie Johnson	Bradley Edwards	Epstein Order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02199-02203	09/18/2009	Jacquie Johnson	Bradley Edwards	Epstein Order	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02211-02214	07/01/2009	Paul Cassell	Bradley Edwards	Epstein v. State of Florida- Emergency Petition for Writ of Certiorari	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02224	07/28/2009	Jacquie Johnson	Bradley Edwards	Witness of Epstein rapes from Switzerland	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10787-10799	10/19/2009	Bradley Edwards	Jacquie Johnson	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10901-10902	05/11/2009	Bradley Edwards	William Berger	RICO Enterprise	Work product; attorney/client privilege;

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10904-10905	05/11/2009	Attorneys at RRA	Bradley Edwards	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10908-10909	05/11/2009	Attorneys at RRA	Bradley Edwards	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10912-10913	05/11/2009	Attorneys at RRA	Bradley Edwards	RICO Enterprise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10955-10963	06/01/2009	Bradley Edwards	William Berger	Plaintiff's Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10979-10981	06/03/2009	Bradley Edwards	Wayne Black	Serve Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11022-11025	06/26/2009	Bradley Edwards	Wayne Black	Info on 2 MC2 Workers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11036-11037	07/21/2009	Bradley Edwards	Wayne Black	Serve Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11039-11071	07/21/2009	Bradley Edwards	Wayne Black	Retainer from the Firm	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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11083-11084	09/04/2009	Attorneys at RRA	Bradley Edwards	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11105-11110	09/09/2009	Jacque Johnson	Bradley Edwards	Disseminate letter from Wexner attorney	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11137-11139	10/03/2009	Paul Cassell	Bradley Edwards	Zorro Trust research info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11143-11146	10/04/2009	William Berger	Bradley Edwards	11/28 Discovery Cutoff	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11155-11156	10/18/2009	Attorneys at RRA	Bradley Edwards	New Property	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11175-11183	04/27/2009	Marc Nurik	Bradley Edwards	Epstein Case info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11196-11197	05/28/2009	Susan Stirling	Bradley Edwards	Jail Visitors	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11205-11207	05/28/2009	Paul Cassell	Bradley Edwards	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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11215	06/01/2009	William Berger	Bradley Edwards	Activity in Case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11238-11239	06/03/2009	Wayne Black	Bradley Edwards	Depo Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11246-11247	06/22/2009	Wayne Black	Bradley Edwards	Epstein Article	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11251-11254	06/23/2009	Wayne Black	Bradley Edwards	Info on 2 MC2 workers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11267-11268	06/30/2009	William Berger	Bradley Edwards	Witness List revised	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11282-11315	07/18/2009	Wayne Black	Bradley Edwards	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11326-11331	08/03/2009	Jacquie Johnson	Bradley Edwards	Donald Trump depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11337-11339	08/04/2009	Mike Fisten	Bradley Edwards	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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11359-11362	08/10/2009	Jacquie Johnson	Bradley Edwards	Epstein depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11366-11371	08/11/2009	Jacquie Johnson	Bradley Edwards	Trump depo info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11377-11379	08/12/2009	Jacquie Johnson	Bradley Edwards	Issuing Subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11390-11395	08/17/2009	Jacquie Johnson	Bradley Edwards	Witness depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11400-11415	08/18/2009	Jacquie Johnson	Bradley Edwards	Subpoenas for pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11420-11426	08/24/2009	Attorneys at RRA	Bradley Edwards	Serving Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11428-11429	08/26/2009	Attorneys at RRA	Bradley Edwards	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11568	10/07/2009	Paul Cassell	Bradley Edwards	Meeting with Leslie Wexner	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11587	10/23/2009	Paul Cassell	Bradley Edwards	Visoski Depo	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11861-11865	10/23/2009	Attorneys at RRA	Bradley Edwards	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11870-11871	08/24/2009	Attorneys at RRA	Bradley Edwards	Epstein info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11874	08/24/2009	Jacque Johnson	Bradley Edwards	Confidential info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11876	08/24/2009	Attorneys at RRA	Ken Jenne	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11967-11972	10/29/2009	Cara Holmes	Jacque Johnson	Subpoenas for Epstein's Attorneys	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08072-08075	07/22/2009	Paul Cassell	Bradley Edwards	Total counts for E.W.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08090-08091	10/05/2009	William Berger	Bradley Edwards	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08114-08117	08/18/2009	Pat Diaz	Bradley Edwards	Updated Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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08157-08159	06/03/2009	Carla Martinez	Bradley Edwards	Vanity Fair	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08499-08501	08/24/2009	Attorneys at RRA	Bradley Edwards	Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10063-10068	08/03/2009	Bradley Edwards	Mike Fisten	Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10090-10091	08/31/2009	Attorneys at RRA	Jacquie Johnson	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10103-10104	08/27/2009	Attorneys at RRA	Ken Jenne	Witness Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10106-10137	08/24/2009	Attorneys at RRA	Ken Jenne	Meetings/ Confidential Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
12569	07/30/2009	Carl Linder	Bradley Edwards	Epstein Sex Abuse Litigation Forum	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15827-15837	07/22/2009	Jacquie Johnson	Bradley Edwards	Retainer for Investigator	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
15820-15822	10/29/2009	Jacquie Johnson	Cara Holmes	Subpoenas for Epstein's Attorneys	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15401-15412	09/09/2009	Jacquie Johnson	Bradley Edwards	Disseminate the letter from wexner atty	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15356-15359	08/26/2009	Attorneys at RRA	Bradley Edwards	Witness info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
14934-14950	07/22/2009	Jacquie Johnson	Bradley Edwards	Investigator info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
13413-13414	08/06/2009	Denis Kleinfeld	Bradley Edwards	Epstein information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
13908-13911	08/24/2009	Attorneys at RRA	Mike Fisten	Meeting info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10595-10597	09/29/2009	Bradley Edwards	Jacquie Johnson	Subpoena for Adriana Mucinska	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10621-10624	10/02/2009	Bradley Edwards	Jacquie Johnson	Meeting with Wexner atty	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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10633-10638	10/05/2009	Bradley Edwards	William Berger	Trial Prep	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10681-10692	10/07/2009	Jacquie Johnson	Mike Fisten	Depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10777-10786	10/16/2009	Bradley Edwards	Paul Cassell	New Evidence of Epstein Fraudulent Transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04094-04100	04/07/2009	Bradley Edwards	Paul Cassell	Draft Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02915	10/03/2009	Attorneys at RRA	Mike Fisten	Finances	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02971	10/14/2009	Jacquie Johnson	Bradley Edwards	Larry Visoski depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02976	09/09/2009	Jacquie Johnson	Bradley Edwards	Disseminate the letter from wexner	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02995	06/24/2009	Bradley Edwards	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10172-10178	08/12/2009	Bradley Edwards	Jacquie Johnson	Trump Depo	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10193	08/11/2009	Bradley Edwards	Jacque Johnson	Trump Depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10255	09/09/2009	Bradley Edwards	William Berger	Depo of Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
10259-10263	09/09/2009	Attorneys of RRA	Jacque Johnson	Cooperfield Service	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03876-03877	10/26/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03879-03884	07/13/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03886-03891	07/13/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03905-03920	09/08/2009	William Berger	Bradley Edwards	E.W., L.M. Doe v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03937	08/17/2009	Carolyn Edwards	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
04005-04011	05/13/2009	Bradley Edwards	William Berger	Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04070-04093	04/07/2009	Bradley Edwards	Paul Cassell	Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03754	07/08/2009	Paul Cassell	Bradley Edwards	Conference Call	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03848-03858	09/09/2009	Bradley Edwards	Jacquie Johnson	Cooperfield Service	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03642-03643	09/04/2009	Paul Cassell	Bradley Edwards	1. Accounts/ 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03657-03661	09/04/2009	Attorneys at RRA	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02475	06/15/2009	Susan Stirling	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02494-02515	09/20/2009	Bradley Edwards	Pat Diaz	Mark Epstein Info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
02520-02543	06/06/2009	Bradley Edwards	Paul Cassell	Memo of Asset Transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02548-02553	08/03/2009	Beth Williamson	Bradley Edwards	Federal Subpoena	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02560-02565	07/31/2009	Bradley Edwards	Jacque Johnson	Federal Subpoena	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02568-02570	10/13/2009	Jacque Johnson	Bradley Edwards	New Times Article	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02578-02583	05/28/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02619-02622	09/09/2009	Jacque Johnson	Bradley Edwards	New client Retainer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02633-02646	05/01/2009	Paul Cassell	Bradley Edwards	Response to Motion to Consolidate + Cassell strategy Memo for Jay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07959-07964	09/24/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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07967-07975	09/22/2009	Jacquie Johnson	Mike Fisten	Subpoena on Epstein case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07979-08000	08/18/2009	Bradley Edwards	Jacquie Johnson	Subpoenas for Pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07735-07736	07/24/2009	Bradley Edwards	Jacquie Johnson	Releases for therapist	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07643-07645	09/09/2009	Bradley Edwards	Jacquie Johnson	New client Retainer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07698-07706	09/06/2009	Paul Cassell	Bradley Edwards	Answer to the Complaint	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07620-07632	08/14/2009	Jacquie Johnson	Bradley Edwards	Review of "Notice of Taking Depo – RC – Bear Sterns"	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07635-07636	10/15/2009	Mike Fisten	Bradley Edwards	Questions from forensic accountant detecting Epstein fraudulent transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07617-07618	07/13/2009	Paul Cassell	Bradley Edwards	Epstein strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07550-07589	10/30/2009	Bradley Edwards	Paul Cassell	Motion to Supplement with the	Work product; attorney/client privilege;

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				Visoski depo	irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07595-07604	05/20/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07616	07/22/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07530-07549	06/11/2009	Bradley Edwards	Susan Stirling	Overtime	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07470-07507	07/09/2009	Paul Cassell	Bradley Edwards	Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07447-07469	10/13/2009	Attorneys at RRA	Russell Adler	New Times Article on epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07444-07446	05/01/2009	Bradley Edwards	Paul Cassell	Response to Motion to Consolidate + Cassell Strategy Memo for Jay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07440	10/18/2009	Attorneys at RRA	Bradley Edwards	New Trump Property	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07436	04/11/2009	Russell Adler	Bradley Edwards	New cases	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
07424-07431	09/26/2009	Bradley Edwards	Paul Cassell	Need Depo Transcript	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07412-07423	04/08/2009	Bradley Edwards	Paul Cassell	Draft Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07403-07411	04/08/2009	Paul Cassell	Bradley Edwards	Draft Motion to Strike	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07394-07402	07/10/2009	Bradley Edwards	Paul Cassell	Multiple 2255 Counts	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07386-07392	05/28/2009	William Berger	Bradley Edwards	Motion to Unseal	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07378-07385	04/07/2009	Bradley Edwards	Paul Cassell	Motion to Unseal	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07370-07377	04/07/2009	Paul Cassell	Bradley Edwards	Motion to Unseal	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07354-07369	10/28/2009	Beth Williamson	Bradley Edwards	Motion to Protect 2 nd depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
07346	10/28/2009	Beth Williamson	Bradley Edwards	Motion to protect 2 nd depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07337	10/28/2009	Bradley Edwards	Jacque Johnson	Motion to protect 2 nd depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07328	10/28/2009	Bradley Edwards	Beth Williamson	Motion to protect 2 nd depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07319	10/28/2009	Bradley Edwards	Jacque Johnson	Motion to protect 2 nd depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07313-07318	04/10/2009	Paul Cassell	Bradley Edwards	Motion to Compel – Photograph	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07287-07301	07/08/2009	Bradley Edwards	Paul Cassell	Motion to Compel – File this week?	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07252-07278	09/08/2009	Bradley Edwards	Paul Cassell	Motion for IME + Accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07247-07251	09/08/2009	Paul Cassell	Bradley Edwards	Motion for IME + Accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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07230-07233	06/08/2009	Paul Cassell	Bradley Edwards	Memo on Asset Transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07157-07158	09/29/2009	Russell Adler	Bradley Edwards	RE: Mark Schwartz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07128-07141	07/08/2009	Paul Cassell	Bradley Edwards	Motion for bond asset transfer and memo final	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07094-07098	09/14/2009	Paul Cassell	Bradley Edwards	Letter to Critton RE: Motions to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07025-07027	10/29/2009	Bradley Edwards	Paul Cassell	L.M. and E.W. v. Epstein –	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07099-07106	09/14/2009	Bradley Edwards	Paul Cassell	Letter to Critton RE: Motions to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07071-07078	07/23/2009	Paul Cassell	Bradley Edwards	L.M.'s Son's B-day	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07066-07070	07/23/2009	Bradley Edwards	Paul Cassell	L.M.'s Son's B-day	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07015-07016	10/13/2009	Bradley Edwards	Paul Cassell	Evidence of Asset transfers	Work product; attorney/client privilege;

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				and/or liquidations	irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07019-07024	10/29/2009	Bradley Edwards	Paul Cassell	L.M. and E.W. v. Epstein – I'm on it	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06837-06839	04/08/2009	Beth Williamson	Bradley Edwards	Jane Doe change of address	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06826-06836	04/08/2009	Bradley Edwards	Beth Williamson	Jane Doe change of address	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06823-06825	04/08/2009	Bradley Edwards	Beth Williamson	Jane Doe change of address	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06813-06816	07/02/2009	Paul Cassell	Bradley Edwards	Doe v. Epstein Motion for Extension of Time to File Response/Reply/Answer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06808-06810	09/13/2009	Bradley Edwards	Paul Cassell	"Is Jeffrey Epstein the new Madoff – Running a giant Ponzi scheme?"	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06804-06805	09/13/2009	Paul Cassell	Bradley Edwards	"Is Jeffrey Epstein the new Madoff – Running a giant Ponzi scheme?"	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06794	10/23/2009	Mike Fisten	Bradley Edwards	Interesting Web Site	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06800-06803	09/06/2009	Paul Cassell	Bradley Edwards	RE: 1. Accountants 2. Motion for IME	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06761-06762	08/19/2009	Attorneys at RRA	Paul Cassell	IME Rules	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06767-06769	09/10/2009	Bradley Edwards	Jacque Johnson	IME's	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06782-06787	04/10/2009	Paul Cassell	Bradley Edwards	Confidential Detailed Strategy Memo on Asset Protection Issues	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06744-06747	05/01/2009	Paul Cassell	Bradley Edwards	Depo of Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06736-06739	05/01/2009	Bradley Edwards	Paul Cassell	Asset Protection Issue	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06709-06710	10/14/2009	Bradley Edwards	Mike Fisten	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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06691-06696	07/09/2009	Bradley Edwards	Paul Cassell	How many 2255 claims?	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06683-06686	07/08/2009	Paul Cassell	Bradley Edwards	Hiding Assets	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06654	07/24/2009	Paul Cassell	Bradley Edwards	Secretary Contact info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06599-06600	07/08/2009	Bradley Edwards	Paul Cassell	Hiding Assets	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06574-06590	04/07/2009	Paul Cassell	Bradley Edwards	Motion to Unseal	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06567-06570	07/09/2009	Bradley Edwards	Paul Cassell	Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06558-06561	07/09/2009	Paul Cassell	Bradley Edwards	Motion to Compel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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06554-06557	05/14/2009	Bradley Edwards	Paul Cassell	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06549-06553	05/14/2009	Paul Cassell	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06540-06541	09/21/2009	Bradley Edwards	Mike Fisten	Info on Maxwell	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06537	10/23/2009	Bradley Edwards	Paul Cassell	Doe v. Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06529-06530	10/23/2009	Paul Cassell	Bradley Edwards	Doe v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06496-06505	10/20/2009	Bradley Edwards	Paul Cassell	Visoski depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06177-06181	09/25/2009	William Berger	Bradley Edwards	Financial discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06149-06153	07/10/2009	Paul Cassell	Bradley Edwards	Federal First Amendment Complaint	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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					protected by privacy rights
06118-06146	09/15/2009	Seth Lehrman	Bradley Edwards	Farnsworth v. Macys case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06113-06117	07/14/2009	Bradley Edwards	Richard Wolfe	Facebook/Myspace	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06106-06112	05/19/2009	Amy Swan	William Berger	Expert Witness	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06091	08/04/2009	William Berger	Paul Cassell	EW and LM v. Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06001-06011	07/18/2009	Paul Cassell	Bradley Edwards	Epstein's Address and Position of Critton on Motion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05996	04/08/2009	Bradley Edwards	Beth Williamson	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05998-06000	09/17/2009	Jacquie Johnson	Bradley Edwards	Epstein: Forensics/Investigations INVOICE	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05992	04/19/2009	Bradley Edwards	Marc Nurik	Litigation Strategy	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05968	10/17/2009	Bradley Edwards	William Berger	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05944-05947	05/01/2009	William Berger	Bradley Edwards	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05927	09/18/2009	Bradley Edwards	Amy Swan	Ryan Hall Psychiatrist	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05931-05932	07/27/2009	Amy Swan	Bradley Edwards	Client's Cell Phone Number	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05919-05920	07/28/2009	Bradley Edwards	Amy Swan	Client's Cell Phone Number	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05915	04/22/2009	Bradley Edwards	Marc Nurik	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05911	05/28/2009	Bradley Edwards	William Berger	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05890	07/27/2009	Bradley Edwards	Amy Swan	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05893-05894	07/27/2009	Bradley Edwards	Amy Swan	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05898-05899	07/28/2009	Bradley Edwards	Amy Swan	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05885	09/15/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05874-05879	07/23/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05868	08/03/2009	Bradley Edwards	Ken Jenne	Epstein Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05865	09/10/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05860-05861	09/10/2009	Bradley Edwards	Maribel Matiska	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
05845	07/24/2009	Bradley Edwards	Ken Jenne	Plane Tail Numbers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05811	06/09/2009	Bradley Edwards	Susan Stirling	Witness Numbers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05813	08/15/2009	Bradley Edwards	Ken Jenne	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05748-05749	08/11/2009	Bradley Edwards	Jacque Johnson	Litigation Strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05711	05/11/2009	Attorneys at RRA	Bradley Edwards	Subpoena Clinton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05701-05704	04/20/2009	Bradley Edwards	Russell Adler	Epstein strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05687	08/21/2009	Bradley Edwards	Marc Nurik	Alfredo Rodriguez	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05690-05691	05/11/2009	Bradley Edwards	Susan Stirling	Motion to Unseal	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05680-05682	05/11/2009	Bradley Edwards	William Berger	Subpoena Clinton	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05676	08/24/2009	Attorneys at RRA	Mike Fisten	Topics for Meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05648	07/23/2009	Attorneys at RRA	Gary Farmer	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05629	08/03/2009	Bradley Edwards	Mike Fisten	Law Enforcement cannot release juvenile reports	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05621-05622	09/18/2009	Amy Swan	Bradley Edwards	Preparing Motion to take an IME of Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05610-05612	04/27/2009	Susan Stirling	Bradley Edwards	Request for Copies	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05588-05590	08/24/2009	Attorneys at RRA	Bradley Edwards	Travel restrictions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05575-05576	08/21/2009	Marc Nurik	Bradley Edwards	Alfredo Rodriguez	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05582	09/11/2009	Bradley Edwards	Mike Fisten	Epstein strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05569-05570	08/17/2009	Marc Nurik	Bradley Edwards	Legal Opinion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05556-05558	08/14/2009	Attorneys at RRA	Bradley Edwards	Communication with legal expert	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05537	07/30/2009	Jacque Johnson	Bradley Edwards	No objections from defense counsel regarding depo for Sarah Kellen	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05534	07/24/2009	Ken Jenne	Bradley Edwards	Flight logs for Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05518	07/22/2009	Attorneys at RRA	Bradley Edwards	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05512-05513	07/23/2009	Priscila Nascimento	Nora Batian	Assemble Epstein Litigation meeting	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
05502-05507	07/22/2009	Jacque Johnson	Bradley Edwards	Wayne Black's email	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05475	04/21/2009	Marc Nurik	Bradley Edwards	Call with Chris Hanson from dateline	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05471-05472	08/14/2009	Marc Nurik	William Berger	Legal expert regarding legal issue	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05447	08/14/2009	Marc Nurik	William Berger	Communication with legal expert	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05420-05423	05/20/2009	William Berger	Bradley Edwards	Research on cases saying a judge can postpone one party's depo until the other is completed	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05409-05412	08/17/2009	Bradley Edwards	Marc Nurik	Legal opinion regarding discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05403-05405	04/27/2009	Marc Nurik	Bradley Edwards	Jeffrey Epstein Wikipedia page	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05399	10/17/2009	William Berger	Bradley Edwards	Proposal for settlement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05399	10/17/2009	William Berger	Bradley Edwards	Proposal for settlement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05271-05272	07/22/2009	Bradley Edwards	Jacque Johnson	Depo Dates to take SR, LM, and CW	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05259-05260	07/22/2009	Bradley Edwards	Jacque Johnson	Investigator retainer	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05238	07/14/2009	Bradley Edwards	William Berger	File a request to produce	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05240-05241	08/24/2009	Attorneys at RRA	Ken Jenne	Judge's order on the Epstein probation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05197-05199	08/24/2009	Attorneys at RRA	Ken Jenne	Michael Reiter info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05155-05156	04/20/2009	Russell Adler	Bradley Edwards	Set Epstein's depo duces tecum	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05159-05160	05/28/2009	William Berger	Bradley Edwards	Right to move to reconsider all rulings	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05149-05150	05/27/2009	Susan Stirling	Bradley Edwards	Epstein filed a motion to continue the trial	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05153	08/24/2009	Bradley Edwards	Mike Fisten	Epstein traveling	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05146-05147	05/26/2009	Paul Cassell	Bradley Edwards	The response to the motion to continue is due 6/8	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05137-05144	05/20/2009	Attorneys at RRA	Russell Adler	Epstein litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05133-05136	05/11/2009	William Berger	Bradley Edwards	Subpoena Clinton and others on Sid Garcia's witness list	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01749-01751	10/28/2009	Bradley Edwards	Phaedra Xanthos	Final affidavit from forensic accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
05125-05132	05/05/2009	William Berger	Bradley Edwards	Response to motion to compel all the sex information of his clients	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05115-05117	04/27/2009	Bradley Edwards	Susan Stirling	Epstein depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01699	09/15/2009	Jacquie Johnson	Bradley Edwards	VZ depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05120-05121	05/04/2009	William Berger	Bradley Edwards	Reporter asking how the depo of Epstein went	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05095-05098	07/01/2009	Bradley Edwards	Paul Cassell	Epstein v. State of Florida – Emergency Petition for Writ of Certiorari; Emergency Motion to Review Denial of Stay	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01694	10/17/2009	Jacquie Johnson	Bradley Edwards	PFS	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05066-05067	05/06/2009	Marc Nurik	William Berger	Epstein sealed records and TV	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
05054-05065	08/18/2009	Attorneys at RRA	Mike Fisten	Epstein Potential witnesses	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05049-05053	08/18/2009	Mike Fisten	Bradley Edwards	Subpoenas for potential witnesses	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04957-04964	09/04/2009	Bradley Edwards	Scott Goldstein	Juan Alessi statement and burglary report	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04952-04953	10/28/2009	Attorneys at RRA	Paul Cassell	Epstein injunction filing – accountant affidavit will be sent	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04955-04956	09/03/2009	Attorneys at RRA	Bradley Edwards	Epstein Invoice	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04916-04920	09/11/2009	Elizabeth Villar	Bradley Edwards	Updates on # of victims, billing amounts, etc.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04899	09/10/2009	Bradley Edwards	Jacquie Johnson	Epstein Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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04893-04896	09/10/2009	Jacque Johnson	Bradley Edwards	Epstein Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04890	09/10/2009	Jacque Johnson	Bradley Edwards	Epstein Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04884-04885	09/10/2009	Bradley Edwards	Jacque Johnson	Epstein Discovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01469	07/17/2009	Ken Jenne	Bradley Edwards	Discussions about the Epstein case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04745-04747	08/04/2009	Bradley Edwards	Jacque Johnson	Epstein depo in New York	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04738-04744	08/25/2009	Bradley Edwards	Paul Cassell	Hearing regarding the Epstein computers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04660	10/22/2009	Bradley Edwards	Marc Nurik	Epstein AUSA – Attorneys Fees	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04642-04646	09/11/2009	Bradley Edwards	Beth Williamson	Discussions about Brad's recovery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
04607-04617	09/11/2009	Jacquie Johnson	Bradley Edwards	Holding Fed Subs until we get response on form	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04526-04535	10/17/2009	Bradley Edwards	Paul Cassell	Two ideas regarding strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04488-04490	07/18/2009	Bradley Edwards	Paul Cassell	Taking the 5 th	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01362	09/11/2009	Elizabeth Villar	Bradley Edwards	Getting the forensic aspect off the ground –epstein's asset transfers	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04481-04487	08/18/2009	Paul Cassell	Bradley Edwards	Epstein Subpoena	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05465-05467	06/26/2009	Wayne Black	Bradley Edwards	Subpoenas for trial	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05470	07/11/2009	Bradley Edwards	Wayne Black	Flight Logs	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05496-05497	08/10/2009	Bradley Edwards	Alfredo	Phone Numbers	Work product; attorney/client privilege;

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			Rodriguez		irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05501	07/21/2009	Wayne Black	Bradley Edwards	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05524-05533	07/23/2009	Wayne Black	Bradley Edwards	Addresses for people involved in the case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05541	07/31/2009	Carolyn Edwards	Bradley Edwards	All depositions in Jane Doe's case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05635	10/22/2009	Pat Diaz	Bradley Edwards	New developments that require your expertise	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05640	10/29/2009	Pat Diaz	Bradley Edwards	New Epstein victim	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05652-05653	04/01/2009	Bradley Edwards	Carolyn Edwards	personal discussion	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05671	10/22/2009	Bradley Edwards	Pat Diaz	Litigation strategy	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05696	05/11/2009	Bradley Edwards	Wayne Black	Phone number for one of the other girls on the list of prospective clients	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05815-05816	04/01/2009	Carolyn Edwards	Bradley Edwards	Taking the depos of everyone	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05820-05821	07/23/2009	Bradley Edwards	Wayne Black	Dates for depos of all witnesses in the case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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					to the discovery of the admissible evidence; protected by privacy rights
05824-05825	07/23/2009	Bradley Edwards	Wayne Black	Paula Heil	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05828-05829	07/23/2009	Bradley Edwards	Wayne Black	Dates for depositions of all witnesses in the case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05833-05835	07/23/2009	Bradley Edwards	Wayne Black	FBI has original flight logs and they interviewed pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05839-05841	07/23/2009	Bradley Edwards	Wayne Black	Copies of the flight logs	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05869-05870	04/01/2009	Carolyn Edwards	Bradley Edwards	Personal convo between Brad and Mom	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05913-05914	04/01/2009	Carolyn Edwards	Bradley Edwards	Personal convo between Brad and Mom	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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05995	04/01/2009	Bradley Edwards	Carolyn Edwards	Third party subpoenas for Tatum/Courtney	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06513-06523	06/15/2009	Bradley Edwards	Wayne Black	Ghisella Maxwell info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06699-06701	06/17/2009	Wayne Black	Bradley Edwards	Epstein litigation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07079-07089	09/03/2009	Bradley Edwards	Pat Diaz	Discussion about girls involved in the case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07437-07439	10/19/2009	Paul Cassell	Ronald Wise	New evidence of Epstein Fraudulent transfers + Affidavit from you	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07936-07958	04/28/2009	Earleen Cote	Bradley Edwards	Cases against mansion nightclub	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08006-08011	06/03/2009	Bradley Edwards	Wayne Black	Getting addresses for people for us to serve subpoenas	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
11186-11187	08/19/2009	Bradley Edwards	Bradley Edwards	Plaintiff's Witness List	Work product; attorney/client privilege;

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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26479-26481	08/19/2009	Attorneys at RRA	Ken Jenne	Assistance on the Epstein Case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
27155-27159	10/23/2009	Attorneys at RRA	Steven Jaffe	PACER entries	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26604-26605	10/27/2009	Phaedra Xanthos	Ken Jenne	Political Contributions/advertisement for the rental on Little St. James Island	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
26570	08/13/2009	Scott Rothstein	Marc Nurik	Discussions about Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
04954	10/28/2009	Attorneys at RRA	Jacque Johnson	Creation of another Doe file	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06665-06670	08/12/2009	Shawn Gilbert	Bradley Edwards	Epstein Costs	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
06675-06676	08/26/2009	Shawn Gilbert	Bradley Edwards	Personal convo in regards to moving offices	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
06679-06682	08/26/2009	Bradley Edwards	Shawn Gilbert	Personal convo in regards to moving offices	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
07590-07594	05/13/2009	Shawn Gilbert	Bradley Edwards	Office information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08451-08453	08/17/2009	Bradley Edwards	Pat Diaz	Updated Witness List	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08455-08456	06/03/2009	Carla Martinez	Bradley Edwards	Vanity Fair	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08466-08479	08/26/2009	Attorneys at RRA	Bradley Edwards	Witness info that we need to use	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01767	07/06/2009	Wayne Black	Bradley Edwards	Info on a guy going to victim's boyfriends house	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08379	06/06/2009	Bradley Edwards	Wayne Black	Info on Former FHP trooper subcontracted by Riley	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
08399	07/23/2009	Bradley Edwards	Paul Cassell	Epstein affidavit to the reply memo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
08406	10/30/2009	Attorneys at RRA	Russell Adler	Flying epstein rape survivor to St. Louis to see expert	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05697	08/19/2009	Bradley Edwards	Mike Fisten	Meeting with client	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20330-20334	08/24/2009	Bradley Edwards	Pat Roberts	Serving Alan Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20327-20329	10/17/2009	Attorneys at RRA	Mike Fisten	Property purchased by Epstein in Palm Beach	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20100-20102	08/24/2009	Attorneys at RRA	Bradley Edwards	Epstein's arrival at his building	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20283-20326	10/14/2009	Attorneys at RRA	Mike Fisten	Research regarding Mr. Visoski and questions to consider during the depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20092-20099	08/24/2009	Attorneys at RRA	Ken Jenne	Epstein travel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
20085-20091	10/15/2009	Bradley Edwards	Mike Fisten	Questions from accountant	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19996-20084	10/14/2009	Attorneys at RRA	Mike Fisten	Visoski Research and Questions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20217-20218	08/04/2009	Bradley Edwards	Mike Fisten	Info on Copperfield	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20213-20216	08/03/2009	Attorneys at RRA	Ken Jenne	Info on Copperfield	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20211-20212	08/03/2009	Mike Fisten	Bradley Edwards	Pilots depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20207-20210	08/10/2009	Jacquie Johnson	Bradley Edwards	List of witness	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20201-20204	08/24/2009	Attorneys at RRA	Bradley Edwards	Serving Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
20193-20200	08/24/2009	Attorneys at RRA	Bradley Edwards	Proof of him being out of FL – Violation of the agreement	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19982-19985	09/03/2009	Jacquie Johnson	Mike Fisten	Dave Rogers depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19988	10/07/2009	Jacquie Johnson	Mike Fisten	Depositions	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19971-19981	08/24/2009	Attorneys at RRA	Mike Fisten	Serving Dershowitz	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19969-19970	08/18/2009	Bradley Edwards	Mike Fisten	Subpoenas for Pilots	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
19962-19968	08/03/2009	Bradley Edwards	Mike Fisten	Working with the FBI to get some info	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20190-20192	08/24/2009	Pat Roberts	Bradley Edwards	Personal emails regarding Brad's surgery	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
20187-20189	08/24/2009	Attorneys at RRA	Ken Jenne	Epstein travel	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
19959-19961	07/24/2009	Attorneys at RRA	Bradley Edwards	Flight logs for Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
00156-00157	07/09/2009	Bradley Edwards	Paul Cassell	2255 Problem	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
15366-15367	09/04/2009	Attorneys at RRA	Bradley Edwards	Witness info that we need to use	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01003-01005	10/12/2009	Bradley Edwards	Paul Cassell	Asset movement by Jeffrey Epstein	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01013-01014	10/29/2009	Bradley Edwards	Cara Holmes	Subpoenaing Epstein's attorneys for their fees and accompanying documents	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
01042	07/22/2009	Marc Nurik	Bradley Edwards	New Info that our investigators obtained from current FBI agents	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03133-03134	06/09/2009	Josh Roberts	Bradley Edwards	Personal conversation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
03129-03130	06/09/2009	Josh Roberts	Bradley Edwards	Personal conversation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
03119-03121	06/09/2009	Bradley Edwards	Josh Roberts	Personal conversation	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05440-05441	04/01/2009	Bradley Edwards	Carolyn (Legal Asst. to Jay Howell, Co-Counsel)	CW Personal information	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
02593-02594	05/13/2009	T. Edwards (wife)	Bradley Edwards	Regarding personal information.	Privileged document- irrelevant and not calculated to lead to discovery of admissible evidence, privacy rights of parties involved, spouse privilege
18877-18879	09/10/209	Marc Nurik	Bradley Edwards	Concerning the names of potential witnesses and the issuance of subpoena's for them.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18344-18347	08/24/2009	Bradley Edwards	Mike Fisten	Investigative information and techniques on the Epstein case are discussed.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
18339-18340	08/24/2009	Ken Jenne	Bradley Edwards	Investigative information and techniques on the Epstein case are discussed.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18341-18343	08/24/2009	Mike Fisten	Bradley Edwards	Investigative information and techniques on the Epstein case are discussed.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18853-18854	09/10/2009	Bradley Edwards	Jacque Johnson	Concerning the names of potential witnesses and the issuance of subpoena's for them.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18337-18338	08/03/2009	Bradley Edwards	Mike Fisten	Investigative information and techniques on the Epstein case are discussed.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18306	10/16/2009	Pat Roberts	Ken Jenne	List of future depo's in Epstein case and names of potential witnesses.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18307	10/17/2009	Mike Fisten	Bradley Edwards	Investigative Discussion re: finding of Epstein Assets.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
18308-18309	10/18/2006	Mike Fisten	Bradley Edwards	Investigative Discussion re: finding of Epstein Assets.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18188-18189	09/04/2009	Mike Fisten	Bradley Edwards	Investigative Discussion re: finding of Epstein witnesses and names of potential witnesses.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18184-18185	08/26/2009	Mike Fisten	Bradley Edwards	Investigative Discussion re: finding of Epstein witnesses and names of potential witnesses.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18186-18187	08/31/2009	Bradley Edwards	Jacque Johnson	Discussion of potential witnesses and the process of subpoena for depo's.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
18180-18183	08/24/2009	Bradley Edwards	Mike Fisten	Investigative Discussion re: finding of Epstein witnesses and names of potential witnesses.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05256-05257	07/21/2009	Bradley Edwards	Wayne Black	Investigative Discussion re: strategy of case.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

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<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
05253	08/24/2009	Bradley Edwards	Wayne Black	Investigative Discussion re: strategy of case.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05279-05280	08/24/2009	Bradley Edwards	Pat Roberts	Investigative Discussion re: strategy of case.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05315-05318	07/26/2009	Bradley Edwards	Wayne Black	Investigative Discussion re: strategy of case.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
05209-05211	06/26/2009	Bradley Edwards	Wayne Black	Investigative Discussion re: strategy of case.	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights

EXHIBIT I

NOT A CERTIFIED COPY

EXHIBIT I

**DOCUMENTS PRODUCED BY EDWARDS IN MAY 2012 THAT
ARE ON HIS FEBRUARY 23, 2011, PRIVILEGE LOG
AND IDENTIFIED ON EPSTEIN'S NOVEMBER 16, 2017 EXHIBIT LIST**

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
94	5/22/09 12:13 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01449)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01449	5/22/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
95	5/22/09 12:21 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05148)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05148	5/22/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
97	5/26/09 5:33 p.m.	E-mail from Timothy Malloy to Bradley J. Edwards (05151)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05151	5/26/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
98	5/28/09 2:13 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05161)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05161	5/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
99	5/28/09 2:16 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02241-02242)	p. 46

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02241-02242	5/28/09	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
102	6/9/09 3:10 p.m.	E-mail from Bradley J. Edwards to Eric Glasser (06655)	pp. 54-55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06655	6/9/09	Confidential	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
105	6/23/09 1:13 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05239)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05239	6/23/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
106	6/23/09 1:16 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05203)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05203	6/23/09	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
107	6/23/09 1:29 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05277-05278)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05277-05278	6/23/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
108	6/23/09 2:31 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05207-05208)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05207-05208	6/23/09	Confidential Course	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
109	6/23/09 2:41 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05324-05325)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05324-05325	6/23/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
110	6/23/09 2:53 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05212-05213)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05212-05213	6/23/09	Confidential Source	Bradley Edwards	Secret Plea Deal for Epstein Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
111	6/23/09 3:08 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05344-05346)	p. 48

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05344-05346	6/23/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
112	6/23/09 3:12 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05215-05217)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05215-05217	6/23/09	Confidential Source	Bradley Edwards	Secret Plea Deal of Epstein providing new witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
113	6/23/09 4:39 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05368-05369)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05368-05369	6/23/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
114	6/23/09 5:22 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05220-05221)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05220-05221	6/23/09	Confidential Source	Bradley Edwards	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
115	6/23/09 5:28 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05387-05388)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05387-05388	6/23/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
116	6/24/09 9:39 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (05224-05225)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05224-05225	6/24/09	Confidential Source	Bradley Edwards	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
119	7/4/09 4:37 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02204)	pp. 46-47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02204	7/14/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
120	7/15/09 1:17 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (04906)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04906	7/15/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
121	7/15/09 1:22 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (04905)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04905	7/15/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
124	7/22/09 11:22 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01479)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01479	7/22/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
125	7/22/09 11:35 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05803)	p. 49

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05803	7/22/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
129	7/28/09 8:59 a.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01483)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01483	7/28/09	Confidential Source	Bradley Edwards	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
130	7/28/09 8:59 a.m.	E-mail from Susan Spencer Wendel to Bradley J. Edwards (03070)	p. 53

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03070	7/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
131	7/28/09 9:28 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01486)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01486	7/28/09	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
132	7/28/09 10:00 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05848)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05848	7/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
134	7/28/09 1:47 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (11075-11076)	p. 57

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11075-11076	7/29/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
135	7/29/09 1:49 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05852-05853)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05852-05853	7/29/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
136	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05535-05536)	p. 48

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05535-05536	7/30/09	Confidential Source	Bradley Edwards	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
137	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (11320-11322)	p. 57

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11320-11322	7/30/99	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
138	7/30/09 6:06 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05538-05539)	p. 48

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05538-05539	7/30/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
139	7/31/09 11:20 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (11080-11082)	p. 57

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
11080-11082	7/31/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
140	8/10/09 6:59 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06965)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06965	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
141	8/10/09 7:23 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06967)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06967	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
142	8/11/09 8:43 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06968-06969)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06968-06969	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
143	8/11/09 9:29 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06963-06964)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06963-06964	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
144	8/11/09 10:10 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06970-06971)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06970-06971	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
145	8/11/09 12:34 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06959-06960)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06959-06960	8/11/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
146	8/14/09 4:40 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06975)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06975	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
148	8/15/09 6:00 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06972-06973)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06972-06973	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
149	8/17/09 10:32 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06976-06977)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06976-06977	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
150	8/17/09 10:42 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (02442)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02442	8/17/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
152	8/24/09 7:38 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (01506)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01506	8/24/09	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
153	8/25/09 11:03 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (05952-05953)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05952-05953	8/25/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
154	8/26/09 9:56 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (02269)	p. 53

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02269	8/26/09	Confidential Source	Bradley Edwards	Other Rape Victims	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
155	8/31/09 10:58 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02895)	p. 53

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02895	8/31/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
157	9/7/09 1:39 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07612-07613)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07612-07613	9/7/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
158	9/7/09 6:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02595-02596)	p. 53

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02595-02596	9/7/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
159	9/7/09 6:49 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07614-07615)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07614-07615	9/7/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
160	9/7/09 7:00 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07605-07606)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07605-07606	9/7/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
161	9/7/09 8:12 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07607-07608)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07607-07608	9/7/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
162	9/7/09 10:55 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07609-07611)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07609-07611	9/7/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
163	9/8/09 11:43 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04015)	p. 54

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04015	9/8/09	Confidential Source	Bradley Edwards	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
164	9/8/09 11:50 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07646)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07646	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
165	9/8/09 11:53 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07647)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07647	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
166	9/8/09 12:04 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07676-07677)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07676-07677	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
167	9/8/09 1:59 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07674-07675)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07674-07675	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
168	9/8/09 2:04 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07678-07679)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07678-07679	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
169	9/8/09 2:36 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07684-07685)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07684-07685	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
171	9/8/09 2:49 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07695-07697)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07695-07697	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
170	9/8/09 2:42 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07682-07683)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07682-07683	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
172	9/8/09 3:25 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07680-07681)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07680-07681	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
173	9/8/09 7:51 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07686-07688)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07686-07688	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
174	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07689-07691)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07689-07691	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
175	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07692-07694)	p. 51

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
07692-07694	9/8/09	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
179	9/18/09 1:01 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (05619-05620)	p. 48

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
05619-05620	9/18/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
181	9/18/09 2:55 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (01280-01288)	p. 56

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01280-01288	9/18/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
182	9/21/09 1:37 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03081)	p. 54

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03081	9/21/09	Bradley Edwards	Confidential Source	Providing Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
183	9/23/09 8:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04320)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04320	9/24/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
184	9/24/09 6:31 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04321)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04321	9/24/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
185	9/24/09 6:53 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04318-04319)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
04318-04319	9/24/09	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
186	9/24/09 8:45 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (10586-10589)	p. 56

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
10586-10589	9/24/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
187	9/28/09 8:09 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards, cc Renee/Carlos Morrison (02913)	p. 54

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02913	9/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
188	9/28/09 10:06 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (06789)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06789	9/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
189	9/28/09 10:20 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (06788)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06788	9/28/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
190	9/28/09 11:45 p.m.	E-mail from Mike Fisten to Conchita Sarnoff (19986-19987)	p. 55

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
19986-19987	9/28/09	Confidential Source	Bradley Edwards	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
194	10/2/09 4:28 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06979-06980)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06979-06980	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
195	10/2/09 4:52 p.m.	E-mail from Bradley J. Edwards to Mike Fisten (02440-02441)	p. 47

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
02440-02441	10/2/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
196	10/2/09 4:53 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff, cc Jacquie Johnson (06974)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06974	8/11/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
197	10/2/09 6:14 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards, cc Jacquie Johnson (06955-06956)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06955-06956	10/2/09	Bradley Edwards	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
198	10/8/09 4:11 p.m.	E-mail from Bradley J. Edwards to Richard Johnson (06961)	p. 50

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
06961	8/11/09	Bradley Edwards	Confidential Source	Secret Plea Deal for Epstein	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
202	10/14/09 7:39 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (03190)	p. 54

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03190	10/14/09	Bradley Edwards	Confidential Source	Additional Information re; Epstein Strategies	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
203	10/14/09 9:02 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03189)	p. 54

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
03189	10/14/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Strategies	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EPSTEIN'S NOVEMBER 16, 2017, EXHIBIT LIST			
No.	Date	Document	Privilege Log
208	10/20/09 1:01 p.m.	E-mail from George Rush to Bradley J. Edwards (01433)	p. 52

FARMER JAFFE'S FEBRUARY 23, 2011 PRIVILEGE LOG					
Bates	Date	To	From	Description	Objection
01433	10/20/09	Bradley Edwards	Confidential Source	Additional Information Re: Epstein Molestations	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence

EXHIBIT J

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
AND FOR PALM BEACH COUNTY, FLORIDA

Case No. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

vs.

SCOTT ROTHSTEIN, individually;
BRADLEY EDWARDS, individually,

Defendants/Counter-Plaintiffs.

TRANSCRIPT OF PROCEEDINGS

DATE TAKEN: Thursday, March 8th, 2018
TIME: 1:30 p.m. - 4:50 p.m.
PLACE 205 N. Dixie Highway, Room 10D
West Palm Beach, Florida
BEFORE: Donald Hafele, Presiding Judge

This cause came on to be heard at the time and
place aforesaid, when and where the following
proceedings were reported by:

Elaine V. Williams
Palm Beach Reporting Service, Inc.
1665 Palm Beach Lakes Boulevard, Suite 1001
West Palm Beach, FL 33401
(561) 471-2995

1 APPEARANCES:

2 For Plaintiff/Counter-Defendant:

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By KARA BERARD ROCKENBACH, ESQUIRE
5 By SCOTT J. LINK, ESQUIRE

6 For Defendant/Counter-Plaintiff:
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By JACK SCAROLA, ESQUIRE
9 By DAVID P. VITALE JR., ESQUIRE
By KAREN TERRY, ESQUIRE

10

11 For Non-Parties L.M., E.W. & Jane Doe

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14

15 For Jeffrey Epstein:

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17 West Palm Beach, FL 33401
By JACK A. GOLDBERGER, ESQUIRE

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1 MR. SCAROLA: That is correct. The Conrad
2 Scherer firm was involved in that litigation, and
3 the Conrad Scherer firm was also interested in
4 getting to take a look at whatever relevant e-mails
5 might have been in the hands of the bankruptcy
6 trustee, and then got turned over to us.

7 Well, there were direct negotiations in which
8 I was a personal participant with the lawyers for
9 Conrad Scherer, and an agreement was reached with
10 the lawyers for Conrad Scherer because, as we have
11 told every judge before whom we have appeared with
12 regard to these matters, we're not attempting to
13 hide anything. (You want to conduct an in-camera
14 inspection) (we want you to conduct an in-camera
15 inspection because it will confirm that we're not
16 attempting to hide anything).

17 We will turn over anything that you consider
18 appropriate for us to turn over. But we have no
19 ability to waive our client's attorney-client
20 privilege, your Honor, and some of these e-mails
21 clearly contain information that originated with
22 clients. And we are in the midst at this point of
23 still-pending litigation, and it is important for
24 us to protect our work product privilege as well.
25 Some of that litigation is still ongoing right now.

1 that was not in the hands of Mr. Epstein's lawyers
2 since 2009, whenever this all came to fruition,
3 then I would say we'd have to take a different
4 approach. But the very nature of the documents
5 that we're talking about -- again, rightly or
6 wrongly held -- were in fact held by Fowler White,
7 Epstein's counsel, at an incredible crucial time in
8 this process; and that being in and around 2010,
9 when the Rothstein firm imploded, when these
10 e-mails were apparently confiscated, when somebody
11 made the decision that instead of Farmer paying for
12 the copy costs, they be handed over to Fowler
13 White. And if I have a bit of an incredulous tone
14 to that statement, it's probably purposeful.

15 But the fact remains, Mr. Link, that these
16 materials were in the hands of Epstein's attorneys
17 from the inception of the issue itself. And to now
18 come to the Court with not five pages of documents
19 to look at, but 27,000, or whatever that number
20 is -- it escapes me because of its sheer mass -- is
21 impossible and is not going to be countenanced
22 here.

23 (And I understand what you're going to tell me
24 because I've gotten a flavor for some of these
25 documents that have been provided).

1 MR. LINK: Yes, sir.

2 THE COURT: (And that is that they are
3 detrimental to the position taken by Mr. (Edwards
4 and that they are helpful to the position taken by
5 Mr. (Epstein).

6 The issue, though, is one of whether the
7 protocol and the orderly administration of justice
8 is going to be forsaken notwithstanding also the
9 aspect of privilege and the sanctity of privileged
10 communications, whether all of those considerations
11 are going to be thrown out when balanced against
12 material that has been in the hands of
13 Mr. Epstein's lawyers from day one. And I, for
14 one, am not going to sacrifice protocol over what
15 may or may not be, number one, privileged, and if
16 not privileged, certainly late disclosed
17 documentation of a massive nature.

18 Should the amount of documentation be a
19 determinative factor in a court's analysis in this
20 context, based upon 35 years of compound
21 experience, bench and bar, and a little bit more
22 now than half on the bench, I do not believe that
23 the orderly administration of justice should be
24 countenanced and should be disruptive. Should be
25 disruptive.

EXHIBIT K

NOT A CERTIFIED COPY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.

**MOTION FOR ISSUANCE OF AN ORDER TO SHOW CAUSE WHY FOWLER
WHITE AND JEFFREY EPSTEIN SHOULD NOT BE HELD IN CONTEMPT OF
COURT, TO PERMIT DISCOVERY, TO ASSESS SANCTIONS AND COSTS, AND FOR
OTHER APPROPRIATE RELIEF**

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. ("Farmer Jaffe"), through counsel, hereby moves this honorable Court for an Order to Show Cause Why Fowler White and Jeffrey Epstein Should Not Be Held in Contempt of Court, to Permit Discovery, to Assess Sanctions and Costs, and for Other Appropriate Relief, and as grounds therefore states as follows:

INTRODUCTION

As the Court will recall from previous litigation in this matter, Jeffrey Epstein is a convicted sex offender who has been sued by dozens of victims for sexual abuse of children. In the course of the above-captioned bankruptcy proceedings, in 2010, Epstein served a broad subpoena attempting to secure thousands of attorney communications by Farmer Jaffe attorney Bradley J. Edwards, Esq., who while previously employed as an attorney at Rothstein Rosenfeldt Adler ("RRA") had represented a number of Epstein's victims in their civil suits against Epstein. Farmer Jaffe sought to have Epstein bear the costs of copying and Bates stamping these thousands of documents [DE 1120], ultimately resulting in an order from this Court that Epstein's counsel—attorneys at the law firm of Fowler White Burnett, P.A. ("Fowler White")—would make a copy of the materials and return them to Farmer Jaffe. Because of Farmer Jaffe's obvious concern that

Epstein or his legal counsel might misappropriate these documents while in their physical possession for the limited purpose of copying and Bates numbering them, this Court specifically ordered that “Fowler White *will not retain* any copies of the documents contained on the discs provided to it, nor shall any images or copies of said documents be retained in the memory of Fowler White’s copiers.” [DE 1194]. To ensure compliance with its order involving the transmission of highly sensitive materials, this Court specifically added an enforcement provision: “Should it be determined that *Fowler White or Epstein* retained images or copies of the subject documents on its computer or otherwise, *the Court retains jurisdiction* to award sanctions in favor of Farmer, Brad Edwards or his client.” [DE 1194].

Remarkably, in clear and intentional defiance of this Court’s order, Farmer Jaffe recently discovered that Fowler White indeed retained a copy of the confidential materials at issue—and those materials have now been passed along to Epstein’s current set of lawyers, as well as to Epstein personally. Not to put too fine a point on it, Epstein and his lawyers at Fowler White appear to have misappropriated a set of confidential documents, which include sensitive and attorney-client protected communications about Epstein’s sex abuse victims, and those documents to this day remain in the possession of the victims’ sexual abuser, Epstein.

Farmer Jaffe asks this Court to enter an order to show cause, to allow appropriate discovery into the apparent misconduct, and to ultimately enter sanctions and costs as may be appropriate.

HISTORICAL BACKGROUND

While information surrounding the apparent misappropriation of privileged documents is continuing to be revealed, it appears that the following facts cannot be reasonably contested by Fowler White or Epstein and, should any of them be contested, Farmer Jaffe requests an evidentiary hearing to prove them:

1. From the 1990s through the 2000s, billionaire Jeffrey Epstein sexually abused dozens of then-minor girls in his Palm Beach mansion in the Southern District of Florida and elsewhere. Several of these victims, including L.M., E.W., and “Jane Doe,” were represented by Farmer Jaffe attorney Bradley J. Edwards in their civil suits against Epstein. [DE 1120].

2. Edwards filed the three sexual abuse lawsuits against Epstein in 2008 while a sole practitioner before taking the cases with him while Edwards was employed at RRA from April 2009 through the firm's implosion in November 2009.

3. In late 2009, Epstein sued Edwards for purportedly improperly representing his clients who were Epstein's sex abuse victims. *Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards, and L.M.*, Fifteenth Judicial Circuit, in and for Palm Beach County, Florida Case No. 50-2009 CA 040800XXXX MB AG (hereinafter “the Epstein lawsuit”).

4. On April 17, 2010, Epstein served a subpoena in the Epstein lawsuit upon Rothstein Rosenfeldt Adler, PA (“RRA”) Bankruptcy Trustee Howard Stettin, seeking to obtain documents from the Trustee, which included documents from attorney Edwards related to Edwards' representation of the sex abuse victims while at RRA. [DE 807].

5. On May 18, 2010, this Court entered an Order approving a proposed Document Production Protocol delineating the process that the RRA Bankruptcy Trustee would use to identify documents responsive to (among other requests) Epstein's subpoena. [DE 672]. The Order provided this Court with jurisdiction over all discovery sought from the RRA Trustee.

6. On August 13, 2010, this Court appointed former Broward County Circuit Judge Robert Carney as Special Master, who was directed to work with counsel for the Trustee to obtain documents responsive to the subpoena served upon the Trustee by Jeffrey Epstein. Specifically, the Special Master was to: “(i) review all electronically stored information (“ESI”) and other

documents in the Trustee's possession, including Qtask¹ data for purposes of determining the applicability of the attorney/client and work product privileges that may inure to the benefit of L.M., and Brad Edwards, and other current or former clients of Farmer, Jaffe; (ii) segregate any such privileged documents; and (iii) prepare a privilege log in accordance with standard practice and law." [DE 888].

7. On September 20, 2010, Special Master Carney moved for clarification of this Court's order, suggesting that Farmer Jaffe be permitted the opportunity to review the documents themselves in order to determine the applicability of privileges. [DE 1013].

8. On October 15, 2010, this Court amended [DE 888] to require the RRA Trustee to provide the emails at issue to Farmer Jaffe and requesting that Farmer Jaffe prepare the privilege log. [DE1068].

9. On November 2, 2010, L.M. and Edwards filed a Motion requesting that Epstein, the party seeking the discovery, bear the printing expense and other reasonable costs and attorney's fees associated with his discovery request. [DE 1120].

10. On November 30, 2010, this Court entered an Agreed Order directing the law firm of Fowler White Burnett, P.A. to print a hard copy of all of the documents contained on the discs with Bates numbers added, and provide a set of copied, stamped documents to the Special Master and an identical set to Farmer Jaffe Weissing Edwards Fistos & Lehrman ("Farmer Jaffe"). The Farmer Jaffe attorneys were to then use their set to create its privilege log. [DE 1194].

11. The Court, recognizing the trust Farmer Jaffe was being forced to place in the adversary lawyers to perform the copying and Bates numbering without stealing the materials, specifically ordered, "**Fowler White will not retain any copies of the documents contained on**

¹ Qtask was an internal firm electronic communication platform.

the discs provided to it, nor shall any images or copies of said documents be retained in the memory of Fowler White's copiers. Should it be determined that Fowler White or Epstein retained images or copies of the subject documents on its computer or otherwise, the Court retains jurisdiction to award sanctions in favor of Farmer, Brad Edwards or his client." [DE 1194].

12. On December 13, 2010, 27,542 bates stamped documents were provided to Farmer Jaffe.

13. On January 25, 2011, Farmer Jaffe provided Epstein with 8,408 pages of non-privileged emails.

14. On January 26, 2011, Farmer Jaffe served Epstein with a privilege log governing the remainder of the documents.

15. On February 15, 2011, Epstein challenged the privilege log as insufficient before this Court. [DE 1442].

16. On February 23, 2011, Farmer Jaffe provided Epstein with an additional 12,711 pages of emails,² and an Amended Privilege Log containing 159 pages identifying the remaining 6,471 pages of emails containing privileged information that were not being produced.

17. On March 25, 2011, Special Master Carney filed his Interim Report before this Court confirming that of the more than 27,000 pages of emails, all documents had been released to Epstein subject to confidentiality provisions, with the exception of the documents identified on

² The 12,711 pages of documents were divided into two separate categories respectively labeled "attorneys eyes only" and "Farmer Jaffe Irrelevant E-Mails." Two boxes of "attorneys eyes only" documents were produced containing 1,829 pages of documents in the first box and 3,198 pages of documents in the second box, totaling 5,027 pages. Two additional boxes of "Farmer Jaffe Irrelevant E-Mails" were also produced containing 3,804 pages of documents in the first box and 3,880 pages of documents in the second box, totaling 7,684 pages.

Farmer Jaffe's 159-page privilege log of February 23, 2011, which documents were not subject to discovery. [DE 1570].

18. In 2012, additional litigation ensued regarding some of the documents in state court in the Epstein lawsuit against Edwards.³

19. To date, 21,282 pages of emails have been permissibly and lawfully provided to Epstein. Consequently, 6,471 pages of emails have *never* been provided to be retained by Epstein and his lawyers as they are protected by various privileges including attorney client privilege and work product privilege and remain on the privilege log.

RECENT EVENTS

20. On November 1, 2017, the law firm of Link & Rockenbach, P.A. entered a Notice of Appearance in the Epstein lawsuit, pending before Judge Donald Hafele (the successor to Judge Crow). As it has evolved, Epstein's lawsuit against Edwards was dismissed and the lawsuit now

³ Specifically, on April 10, 2012, Judge David F. Crow (presiding over the Epstein lawsuit) entered an Order requiring Edwards to produce any non-privileged documents identified in paragraph 13 of Epstein's Motion to Compel and Amend Protective Order, which specifically only included emails relating to news reporters or the media. On May 7, 2012, Judge Crow entered an Order on Plaintiff Jeffrey Epstein's Motion to Compel Production of Documents from Defendant Bradley Edwards and for Sanctions stating, "Bradley Edwards shall within 30 days of the date of this order file a more complete privilege log. The Court finds the privilege log is insufficient on its face and does not comply with the requirements of F.R.C.P. 1.280(b)(5) and *TIG Ins. Corp. v. Johnson*, 799 So. 2d 339 (Fla. 4th DCA 2001). In all other respects the Motion is denied at this time."

On May 8, 2012, Edwards provided Epstein with 163 pages of emails pursuant to Judge Crow's April 10 Order. On May 15, 2012, Edwards filed a Motion for Clarification of Recent Discovery Orders before Judge Crow. On August 17, 2012, Judge Crow granted Edwards's Motion for Clarification and vacated its Order of May 7, 2012 without prejudice upholding Edwards's February 23, 2011 Privilege Log and requiring Edwards only to file written response specifically addressing the production sought in Paragraph 13 of Epstein's Motion to Compel and Amend Protective Order of March 9, 2012 as Ordered in this Court's April 10, 2012 Order.

Ultimately, following a summary judgment motion by Edwards, Epstein dropped his lawsuit; currently pending before Judge Crow's successor, Judge Hafele, is a follow-on action, *Edwards v. Epstein*, for malicious prosecution by Epstein in filing his lawsuit in the first place.

involves a malicious prosecution claim brought by Bradley Edwards against Jeffrey Epstein. Edwards alleges that Epstein sued him, with malice and without probable cause, for representing then-minor girls sexually abused by Epstein, including L.M.

21. On March 2, 2018, Epstein, through counsel Scott Link and Kara Rockenbach, Epstein filed Plaintiff/Counter-Defendant Jeffrey Epstein's Notice of Filing of Redacted Appendix in Support of Response in Opposition to Defendant/Counter-Plaintiff Bradley J. Edwards' Second Supplement to Motion in Limine Addressing Scope of Admissible Evidence. Included in Epstein's 353-page filing were at least 49 privileged emails spanning over 100 pages, that are subject to various privileges pursuant to the privilege log and that were *never* lawfully permitted to be provided to Epstein or retained by his lawyers. Epstein attached not only actual copies of various emails, but also provided a purported "summary" of the emails, which included specific quotations from communications over which attorney-client privilege and other protections had been repeatedly asserted, by Farmer Jaffe, Edwards, and L.M. Epstein also provided a wholly out-of-context and substantially misleading summary of what he believed the emails demonstrated. In subsequent filings in court proceedings, he has continued to reference the content of privileged documents and mischaracterize their significance in the pending state court malicious prosecution case.

22. On March 5, 2018, Edwards filed his Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Farmer Jaffe's Privilege Log.

23. On March 7, 2018, L.M. and two other minor girls Epstein had sexually abused, E.W. and Jane Doe, filed an emergency motion to intervene and an emergency motion to join

Edwards' motion to strike. The three victims alleged that Epstein's recent filing disclosed their protected attorney-client communications.

24. On March 7, 2018, counsel for Epstein delivered a flash drive to counsel for Edwards, "*which duplicates the disc we located in Fowler White's files.*" Letter of transmittal attached hereto as **Exhibit A**. The subject flash drive contained three separate PDF files respectively titled: (1) "Bradley Edwards.pdf" containing 8,507 pages of emails; (2) "Epstein Searches.pdf" containing 17,348 pages of emails; and (3) "Scott Rothstein.pdf" containing 1,687 pages of emails ("subject documents"). Notably, the flash drive indicated that the three PDF files had been last "modified" on December 8, 2010, a mere nine days after this Court ordered Fowler White to take very limited possession of the subject documents to print and Bates stamp them, and then not to retain any copies. This was also a short five days before the Bates stamped documents were delivered to Farmer Jaffe on December 13, 2010.

25. On March 7, 2018, counsel for Epstein also provided a sworn affidavit from certified paralegal Tina L. Campbell that she had obtained these materials from Fowler White's files. Specifically, Ms. Campbell attested under oath that on January 10, 2018, she had reviewed approximately 36 boxes of Fowler White's Epstein files at Fowler White's Miami, Florida offices. During that review, electronic discs found in the Fowler White files were marked for review, but the contents were not reviewed. Affidavit attached hereto as **Exhibit B**. On February 1, 2018, Link & Rothenbach, P.A. received three boxes from the Fowler White firm containing copies of the items that had been marked for reproduction including a disc labeled "Epstein Bate Stamp" handwritten in black sharpie. The disc marked "Epstein Bate Stamp" was not reviewed until February 25, 2018.

26. It is thus undisputed that a disk containing the privileged emails in question was in the possession of Fowler White in early January 2018—a disc showing that it had last been modified on December 8, 2010.

27. On March 8, 2018, Judge Hafele held a hearing regarding the privileged communications. Counsel for Epstein, Edwards, and the three victims at issue (L.M., E.W., and Jane Doe) all appeared. Counsel for Edwards began the hearing by explaining the relevant background as well as how Fowler White had made and retained a copy of the privileged communications in violation of this Court’s order. Counsel for Epstein then responded, arguing that they (i.e., Link & Rockenbach) had not improperly taken any documents from Fowler White. This argument led Judge Hafele to ask, “[t]he critical question, though, is why did Fowler White have these documents, why were they continued to be held, and was it in violation either expressly or constructively as it relates to Judge Ray’s order?” Hearing Trans. at 32:10-14 (all portions of the March 8, 2018 hearing transcript cited herein are attached hereto as **Exhibit C**).

28. Without offering any real explanation in response to the Court’s inquiry, counsel for Epstein simply stated, “[s]o let’s talk about Fowler White because it is as clear as mud.” Hearing Trans. at 35:6-7. Counsel for Epstein further explained that “[w]hen these issues came up, we asked Fowler White to please give us the original boxes. We got the original boxes and found the disc in a folder that says J. Carney printing on it. That’s it. That’s all that’s on this folder.” Hearing Trans. at 45:11-15. Epstein’s counsel then conjectured certain speculative scenarios,⁴ but

⁴ Epstein’s current legal counsel speculated that after a copy of the materials were provided to the Special Master, Judge Carney, that Judge Carney somehow turned around, contacted Fowler White and gave the disk to them. Judge Hafele, however, summarily rejected this speculation, explaining that this would require believing that Judge Carney, “a respected jurist,” was “somehow engaged in some type of ex parte communications with Fowler White.” Hearing Trans. at 44:19-25.

ultimately admitted “I wasn’t there. I can’t tell you what [Fowler White] did. . . .” Hearing Trans. at 45:23-24.

29. During the hearing, counsel for Epstein revealed that Epstein personally had retained copies of the confidential materials, in contravention of the November 30, 2011 Order. Hearing Trans. at 64:7-8 (counsel for Epstein admits that copies of the documents have been provided “within my law firm, and my client.”). When further asked, “Has Mr. Epstein been provided with copies of the documents or the contents of these privileged documents?,” counsel for Epstein replied, “I just said my client. My law firm and my client. And I can say legal counsel, Mr. Goldberger. So that’s it.” Hearing Trans. 64:14-19.

30. During the hearing, counsel for Epstein (Link and Rockenbach) also revealed that Fowler White was disclaiming any memory of the circumstances surrounding the creation and retention of the disc: “We have reached out to lawyers for Fowler White. They have no memory of it.” Hearing Trans. at 35:15-21.

31. Epstein’s claim that Fowler White had “no memory” of the surrounding circumstances led counsel for Edwards to respond that it was difficult to believe Fowler White had no records regarding the disc: “Your Honor knows very well that Fowler White is a very large law firm that keeps meticulous time records with regard to the services they render. And the concept that it is impossible to reconstruct through those time records what was received, when it was received, when it was reviewed, what happened with it, who was informed of what was happening with it, quite frankly, is inconceivable to me.” Hearing Trans. at 60:8-19.

32. Judge Hafele responded in agreement by noting his surprise that Fowler White was not explaining what had happened: “And that’s a good point. What I was going to point out earlier . . . is that I would have expected certainly in deference to the fact that Mr. Epstein was a client of

Fowler White that someone from Fowler White would have had the ability to weigh in somehow as to these critical issues. Perhaps I'm being a bit naive when I say that having served Mr. Epstein in their capacity as counsel, it's my respectful belief that they owed an obligation to Mr. Epstein, if not this Court, to explain how and why they had access and kept these records in their possession in light of that [bankruptcy] court order and in light of this ongoing litigation. And as a matter of respect to Mr. Epstein and his ongoing legal team, to have made some type of affirmative steps to have dealt with this issue head on because of the apparent implications of same." Hearing Trans. at 60:20-61:14.

33. Counsel for victims L.M., E.W., and Jane Doe also asked Judge Hafele to order Fowler White to explain who they had distributed the confidential materials to. Judge Hafele indicated that, in light of Fowler White's withdrawal from the case in front of him, he did not have "that ability" to enter such an order directed against them. Hearing Trans. at 79:25-80:1.

34. Based on the foregoing facts, over the past seven years, Fowler White has been in possession of a disc containing over 27,000 pages of documents—6,741 pages of which were privileged materials *never* lawfully received by them—that they were specifically ordered not to retain in any format. The retained disc in question had the exact number of documents copied to it that Fowler White copied at the direction of this Court on November 30, 2010. And, the subject disc was last modified a mere nine days after this Court ordered Fowler White to copy, Bates stamp, turn over, and permanently destroy the materials from their internal system. This was also a short five days before the final Bates stamped documents were delivered in hard copy to Farmer Jaffe by Fowler White on December 13, 2010—a date after which Fowler White had no lawful reason to retain the subject documents in any format whatsoever.

MEMORANDUM OF LAW

Based on the egregious conduct of Epstein and his attorneys, the exact fear contemplated by the parties, the Special Master, and this Court when the November 30, 2010 order was entered, has alarmingly come to fruition. Despite obligations as officers of this Court to follow a specifically delineated procedure designed to protect highly confidential and privileged materials, Fowler White has apparently deliberately copied and retained highly sensitive confidential and privileged materials for over seven years. Recently, these materials have been disclosed to additional counsel for Epstein and these materials remain in the possession of Epstein personally. The misappropriation of this information has caused irreparable harm. Epstein's current counsel, Link & Rockenbach have also now filed privileged information in the public court file in the *Edwards v. Epstein* matter (although that filing has since been placed under seal) and have repeatedly referenced the privileged content of the misappropriated documents in other filings. Specifically foreseeing the need to ensure that its earlier order was complied with in full, this Court expressly retained jurisdiction to award sanctions in the event of any breach. This Court should take steps to ensure that its order is complied with in the future and to punish and remedy violations in the past.

Farmer Jaffe believes that the true extent of its damages can only be determined through a thorough inquiry into the entire chain of custody detailing the whereabouts of the subject documents since inception and including any person who has seen or been informed of the content of said documents. To that extent, an evidentiary hearing and corresponding discovery are essential, as complete determination of the breadth and degree of complicity by Fowler White and Jeffrey Epstein, both jointly and severally, is imperative to the formulation of the appropriate sanctions in this matter. Farmer Jaffe has the right to inquire as to whether the subject documents

were downloaded into the Fowler White system, whether they were disseminated to third parties, and ultimately when and how they ended up in the hands of Jeffrey Epstein. Stated more succinctly, the sanctions here must be commensurate with the misconduct.

Specific Relief Sought

This Court previously entered an order directing that *both* Fowler White and Epstein were not to “retain[] images or copies of the subject documents on [their] computer[s] or otherwise.” [DE 1194]. In light of the clear violation of that order, Farmer Jaffe⁵ now asks this Court to enter an additional order as follows:

1. Fowler White and Epstein are directed within seven days of the entry of this order to show cause as to why they should not be held in contempt of the Court’s order, DE 1194.
2. Fowler White and Epstein (including all of Epstein’s past and present legal counsel) are directed, within seven days of the entry of this order, to provide to counsel for Farmer Jaffe all physical, electronic, and other information in their possession concerning the copying, retention, and dissemination of the documents covered by DE 1194 (and any materials disclosing the contents of those documents), including (but not limited to) all information regarding the making, retention, and dissemination of these materials on and after December 8, 2010. This information shall include, but is not limited to, any electronic or other information showing the date on which copies were made, the authors of any such copies, emails or transmission of such copies, and any discussion or reference to such copies. Epstein (and all of his past and present legal counsel) shall also provide all correspondence and billing records related to the copying, retention, review, discussion, and dissemination of the subject documents, the Bates stamping of the subject

⁵ This motion is filed on behalf of Farmer Jaffe. It is counsel’s understanding that separate motions to the same effect will be filed shortly by Mr. Edwards and by three victims with privileged materials at issue, L.M., E.W., and Jane Doe.

documents, or any other activity related to the November 30, 2011 Order from the day that the Epstein subpoena was issued on April 17, 2010 through the present.

3. Fowler White and Epstein (including all of Epstein's past and present legal counsel) will provide to Farmer Jaffe within seven days of the entry of this order a listing of all persons or entities to whom the subject documents (or any information derived from the contents of the subject materials) have been viewed and distributed, as well as a certification that they have asked for return of the subject materials.

4. Fowler White and Epstein and any other persons know to have ever possessed these materials, including Epstein's current counsel, shall allow neutral IT specialists appointed by this Court to search all computer servers, including back-up servers and hard-drives, for designated search terms especially found within these privileged materials. While mandatory anyway, under the circumstances Epstein and all past and current counsel, as well as anyone else known or believed to have ever possessed the materials should be strictly ordered to maintain all possible platforms that may contain such privileged information to ensure there is no spoliation of the evidence of the improper retention, review, dissemination or other use of these materials by any person or entity.

5. Counsel for Farmer Jaffe is permitted to obtain deposition testimony of all persons reasonably believed to have knowledge of the circumstances surrounding the copying, retention, or dissemination of the documents at issue in DE 1194.

6. An evidentiary show cause hearing will be held wherein Farmer Jaffe is afforded the opportunity to inquire into the facts and circumstances surrounding the wrongful retention and resulting dissemination of the subject privileged materials, in order for the aggrieved parties and the Court to learn of the full scope of the wrongdoing. Such inquiry should include, but not be

limited to, testimony from Special Master Robert Carney, Jeffrey Epstein, Fowler White Attorney Joseph L. Ackerman, Fowler White Attorney Lilly Ann Sanchez, Jack Goldberger, Tina Campbell, Scott Link, Kara Rockenbach, and the currently unidentified attorneys that Mr. Link has represented are also working on this case on behalf of Epstein from the Gunster law firm.

7. Epstein will pay Farmer Jaffe reasonable attorneys' fees and expenses connected with Farmer Jaffe's efforts to determine the circumstances surrounding the retention and release of the materials and to remedy any damage caused to Farmer Jaffe or its clients from the retention, use or release of the materials.

8. Farmer Jaffe is permitted to seek further relief and sanctions after the discovery described above is completed.

Authority to Enter an Additional Order

This Court's November 30, 2010 Order specifically noted that the Court was retaining jurisdiction to enforce compliance: "Should it be determined that Fowler White or Epstein retained images or copies of the subject documents on its compute or otherwise, the Court *retains jurisdiction* to award sanctions in favor of Farmer, Brad Edwards or his client." [DE 1194 at 2] (emphasis added). The Court clearly has power to now award sanctions and take all other steps necessary to secure compliance.

Of course, all federal courts have the power, by statute, by rule, and by common law, to impose sanctions against recalcitrant lawyers and parties litigant. *Carlucci v. Piper Aircraft Corp.*, 775 F.2d 1440, 1446 (11th Cir. 1985). Even absent explicit legislative enactment, deeply rooted in the common law tradition is the power of any court to "manage its affairs [which] necessarily includes the authority to impose reasonable and appropriate sanctions upon errant lawyers practicing before it." *Id.* at 1447. Federal courts have the inherent power to enforce compliance

with their lawful orders through civil contempt remedies. *Citronelle-Mobile Gathering, Inc. v. Watkins*, 943 F.3d 1297, 1301 (11th Cir. 1991). Courts also have the inherent power to sanction a party for misconduct. *Chambers v. Nasco*, 501 U.S. 32, 42 (1991). As the Supreme Court stated in *Chambers*, “[i]t has long been understood that certain implied powers must necessarily result to our courts of justice from the nature of their institution, powers which cannot be dispensed with in a Court, because they are necessary to the exercise of all others”. *Id.*

Before the Court uses its inherent contempt power, “[a] petitioner ‘must [first] establish by clear and convincing evidence that the alleged contemnor violated [a] court’s earlier order.’” *Chairs v. Burgess*, 143 F.3d 1432, 1436 (11th Cir. 1998) (quoting *United States v. Roberts*, 858 F.2d 698, 700 (11th Cir. 1988)). Once such a prima facie showing of civil contempt has been made, the burden shifts to the contemnor to produce evidence at a show cause hearing that the underlying order was not violated or that the violation was excused by an inability to comply. *Chairs*, 143F.3d at 1436. The violation need not be willful to support a finding of civil contempt. *McComb*, 336 U.S. 187, 191 (1949) (“Since the purpose [of civil contempt] is remedial, it matters not with what intent the defendant did the prohibited act.”). Even inadvertent or partial non-compliance with orders of the Court constitutes civil contempt if the party has not in good faith made all reasonable efforts to comply. *U.S. v. Hayes*, 722 F.2d 723, 725 (11th Cir. 1984).

However, “if the court finds the defendant acted willfully or maliciously in disregarding the injunction, then the court may cite the defendant for criminal contempt.” *Mercer v. Mitchell*, 908 F.2d 763, 769 (11th Cir. 1990) (citing 18 U.S.C. § 401(3) (stating, “[a] court of the United States shall have power to punish by fine or imprisonment, or both, at its discretion, such contempt of its authority, and none other, as—(1) Misbehavior of any person in its presence or so near thereto as to obstruct the administration of justice; (2) Misbehavior of any of its officers in

their official transactions; (3) Disobedience or resistance to its lawful writ, process, order, rule, decree, or command)).⁶

The fundamental purpose behind contempt sanctions are twofold, (1) sanctions can coerce the contemnor into complying in the future with the Court's orders or (2) they can compensate the complainant for losses resulting from the contemnor's past noncompliance. *Citronelle-Mobile*, 943 F.2d at 1304. *See also* *McComb v. Jacksonville Paper Co.*, 336 U.S. 187, 191 (1949); *EEOC v. Guardian Pools, Inc.*, 828 F.2d 1507 (11th Cir. 1987); *Perfect Fit Industries, Inc. v. Acme Quilting Co.*, 673 F.2d 53, 56-57 (2d Cir. 1982), *cert. denied*, 103 S.Ct. 73 (1983). In fact, the Court has “wide discretion to fashion an equitable remedy for contempt that is appropriate to the circumstances.” *Guardian Pools*, 828 F.2d at 1515. *Accord* *United States v. City of Miami*, 195 F.3d 1292, 1298 (11th Cir. 1999). Such options include a coercive daily fine, a compensatory fine, attorney’s fees, expenses to the aggrieved party, and coercive incarceration. *Citronelle-Mobile*, 943 F.2d 1297. Courts have broad power to fashion an appropriate sanction, including anything from entry of monetary sanctions to entry of a final judgment on the merits against a party demonstrated to have committed a fraud upon the court. *See Vargas v. Peltz*, 901 F.Supp. 1572 (S.D. Fla. 1995).

Compensatory sanctions generally include a fine payable to the petitioner the amount of which “is determined by the extent of the actual loss.” *Id.* (citing *United States v. United Mine Workers*, 330 U.S. 258, 303-04 (1947)). Compensatory sanctions also frequently include the payment of the complainant's attorney's fees in seeking the redress. *Hutto v. Finney*, 437 U.S. 678, 689 n. 14 (1978) (“[a]n equity court has the unquestioned power to award attorney's fees against a

⁶See Federal Rule of Criminal Procedure 42, requiring that notice be provided in open court in an order to show cause before indirect criminal contempt can be imposed.

party who shows bad faith by delaying or disrupting the litigation or by hampering enforcement of a court order” and “[o]f course, fees can also be awarded as part of a civil contempt penalty”); *Watkins*, 943 F.2d at 1301, 1304 1301; *Jaeger v. Massis*, No. 00-7390. 2000 U.S. App. LEXIS 27908 (2d Cir. Nov. 3, 2000). Courts within the Eleventh Circuit have not hesitated to impose severe sanctions pursuant to their inherent powers, including cases where a party has acted in bad faith. *See, e.g., In re Mroz*, 65 F.3d 1567 (11th Cir. 1995).

In light of the Court’s sweeping powers to secure compliance with orders, this Court should grant the relief sought by Farmer Jaffe above. There can be no doubt that a *prima facie* showing of contempt has been made by clear and convincing evidence. Fowler White and Epstein were directed not to retain copies of privileged documents. The events cited above show that Fowler White apparently made—and indisputably retained—a copy of the privileged documents. Sometime thereafter, Epstein also obtained and retained a copy of the privileged documents and now numerous unauthorized people have these documents and knowledge of their privileged content.

At the hearing surrounding the confidential materials, Judge Hafele indicated his “respectful belief that [Fowler White] owed an obligation to Mr. Epstein, if not this Court, to explain how and why they had access and kept these records in their possession in light of that [bankruptcy] court order and in light of this ongoing litigation.” Hearing Trans. at 61:5-9. Fowler White, however, has failed to come forward voluntarily. Accordingly, this Court should enter an order to show cause as to why they have not violated this Court’s order. In light of Epstein’s possession of the materials, he should be directed to show cause as well.

In addition, it is already clear that efforts to avoid responsibility for violating the Court’s order are underway. Indeed, Link and Rockenbach has certified that instead of gathering,

cataloguing, and filing under seal all improperly acquired and retained privileged materials, it has directed their destruction, thereby impeding further investigation of the origin of those materials. Accordingly, Fowler White and Epstein (including his legal counsel, past and present) should be ordered to provide all relevant discovery about how the violation occurred. To get to the bottom of this violation and be permitted to identify the necessary witnesses to be examined at the anticipated evidentiary hearing before this Court, Farmer Jaffe also seeks to depose those persons who appear to be in the chain of custody of the improperly copied and retained materials.

Because it is clear that Farmer Jaffe is going to have to bear additional burdens, in terms of time and effort in responding to Fowler White and Epstein's improper copying, retention, and distribution of privileged materials, the Court should award attorneys' fees and expenses. Epstein and his legal counsel have caused these problems; innocent third parties should not bear the financial consequences. Finally, because the violation of this Court's order appears to be evolving and on-going, Farmer Jaffe requests leave to seek supplemental sanctions and remedies after discovery on the violation has been completed.

CONCLUSION

WHEREFORE, Farmer Jaffe respectfully requests that this Court enter an order to Fowler White and Epstein to show cause why they should not be held in contempt of court, allowing discovery and an evidentiary hearing on the circumstances surrounding the improper copying, retention, and distribution of privileged materials, and allowing Farmer Jaffe to seek such other sanctions and remedies as may be appropriate following discovery on these matters. A proposed order to this effect is attached.

I HEREBY CERTIFY that, pursuant to L.R. 9073-1(D), Movant's counsel has contacted Fowler White in a good faith attempt to resolve the matter without a hearing before bringing this motion. Fowler White has failed to respond.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically to the examinee, the debtor, the attorney for the debtor, the trustee, all CM/ECF subscribers, and by email or U.S. Mail on those parties listed on the attached service list this 19th day of March, 2018.

I HEREBY CERTIFY that I am admitted to the Bar of the United State District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

EDWARDS POTTINGER LLC

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*Attorneys for Farmer, Jaffe, Weissing,
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 19, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certified that the foregoing document is being served this day on all counsel of record or pro se parties identified on the on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Bradley Edwards
Bradley Edwards

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Special Master

EXHIBIT L

NOT A CERTIFIED COPY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

FLD*18MAR20PM1241USBCSDF-FTL

T.T.

IN RE:

CASE NO. 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.

CHAPTER 11

JOINDER IN MOTION FOR ISSUANCE OF AN ORDER TO SHOW CAUSE

Bradley Edwards, by and through his undersigned counsel, hereby gives notice of his joinder in the motion filed on behalf of Farmer, Jaffe for issuance of an order to show cause why Jeffrey Epstein and Fowler White should not be held in contempt of court. Edwards adopts all arguments and requests for relief asserted in the referenced motion

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically to the examinee, the debtor, the attorney for the debtor, the trustee, all CME/ECF subscribers, this 19th day of March, 2018.


JOHN SCAROLA

Florida Bar No.: 169440

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Attorneys for BRADLEY J. EDWARDS

EXHIBIT M

NOT A CERTIFIED COPY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.

**L.M., E.W., AND JANE DOE'S JOINDER IN MOTION FOR ORDER TO SHOW
CAUSE AND MOTION FOR DISCOVERY, TO ASSESS SANCTIONS AND COSTS
FOR OTHER APPROPRIATE RELIEF**

Sexual assault victims L.M., E.W., and "Jane Doe" (hereinafter "the Victims"), proceeding pseudonymously and through undersigned counsel, having previously moved to intervene in this action, now file this joinder in Farmer Jaffe's Motion for Issuance of an Order to Show Cause Why Fowler White and Jeffrey Epstein Should Not Be Held in Contempt of Court, to Permit Discovery, to Assess Sanctions and Costs, and for Other Appropriate Relief [DE 6323].

In addition, the Victims seek additional remedies as follows.

FACTUAL BACKGROUND

To avoid duplicative pleadings, the Victims simply adopt, as if set forth in full herein, the factual recitations made by Farmer Jaffe's earlier motion for an order to show cause. [DE 6323 at 1-11.] The Victims would also direct the Court to their contemporaneously filed motion to intervene, which establishes that they have a direct, substantial, and protectable interest in their attorney-client protected materials. These pleadings demonstrate that Fowler White and Epstein have directly violated an order of this Court [DE 1194], which prohibited them from retaining and distributing copies of attorney-client protected materials of the three victims.

RELIEF REQUESTED

The Victims join in and seek, on their own behalves, all of the relief previously requested by Farmer Jaffee. [DE 6323 at 13-15].

In addition, the victims seek the following relief, not specifically sought by Farmer Jaffe.

1. A letter written and signed by both Fowler White and Jeffrey Epstein, and provided to the VZictims, to the following effect: “To Whom It May Concern: The documents listed on the attached list [insert attachment] were impermissibly retained by the undersigned in violation of an order from U.S. Bankruptcy Judge Raymond B. Ray of the Bankruptcy Court for the Southern District of Florida. *See* DE 1194, *In Re: Rothstein Rosenfeldt Adler, P.A.*, No. 09-34791-RBR. If you are in possession of any of the attached documents as a consequence of a violation of the order, you are requested to promptly return it to the attorney who has provided a copy of this letter to you.”

2. Discovery regarding the distribution of the impermissible retained materials, in the form of twenty interrogatories, twenty requests for production, and twenty requests for admission, to be answered by: (1) Jeffrey Epstein; (2) any attorney, paralegal, other law firm employee or consultant, or expert witness who has been involved in the representation of Epstein in the above-captioned matter or in *Epstein v. Edwards*, No. 502009CA040800XXXXMBAG (Cir. Ct. of the 15th Jud. Cir. for Palm Beach County, Fla.).

3. Separate letters of apology for each of the three victims, written by Epstein and all attorneys and staff found to have played a responsible role in the unauthorized retention and release of their privileged materials.

4. A referral from this Court to appropriate disciplinary authorities, including bar authorities, for any attorney found to have apparently violated ethical obligations in connection with the improper retention and subsequent distribution of the materials at issue.

5. Monetary sanctions, payable directly to each of the Victims by Epstein, in the amount of \$25,000 for each of the three victims (a total of \$75,000). After making payment, Epstein is permitted to seek reimbursement from any of his attorneys who may have been responsible.

6. An evidentiary hearing on the circumstances surrounding the violation of the Victims' right of confidentiality, and a finding of civil or criminal contempt as may be appropriate, along with such additional sanctions as the Court may then find to be appropriate.

7. Reasonable attorneys' fees for the Victims for all attorney time, costs, and expenses incurred as a result of the improper retention and subsequent distribution of the materials at issue.

AUTHORITY FOR THE COURT TO AWARD RELIEF

This Court's previous order [DE 1194] specifically indicated that the Court was "retain[ing] jurisdiction" to impose sanctions. In addition, the Court has authority to award sanctions, for all the reasons explained by Farmer Jaffe in its memorandum [DE6323 at 15-19], which authority the Victims also specifically rely upon here.

CONCLUSION

For the foregoing reasons, the Court should grant the three Victims' the relief requested above, including joinder in Farmer Jaffe's motion for sanctions and their own sanctions and other relief as described above.

I HEREBY CERTIFY that, pursuant to L.R. 9073-1(D), Movant's counsel has contacted Farmer Jaffe and Fowler White in a good faith attempt to resolve the matter without a hearing before bringing this motion. Farmer Jaffe supports the Victims' motion. Fowler White has been

contacted via email on March 19, 2018, about the Victims' motion and has thus far failed to respond.

I HEREY CERTIFY that a true and correct copy of the foregoing was served electronically to the examinee, the debtor, the attorney for the debtor, the trustee, all CM/ECF subscribers, and by email or U.S. Mail on those parties listed on the attached service list this 30th day of March, 2018.

I HEREBY CERTIFY that I am admitted to the Bar of the United State District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

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Pro Hac Vice Motion Filed Contemporaneously

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 30, 2018, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certified that the foregoing document is being served this day on all counsel of record or pro se parties identified on the on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Peter E. Shapiro
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