

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.

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**COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION**  
**FOR AN *IN CAMERA* INSPECTION OF 30 E-MAILS**

Counter-Defendant, Jeffrey Epstein ("Epstein"), moves<sup>1</sup> this Court for an *in camera* inspection of 30<sup>2</sup> e-mails identified on Epstein's March 2, 2018 Clerk's Trial Exhibit List and to find that no privilege applies to them. These e-mails directly contradict Edwards' sworn testimony and repeated misrepresentations before this Court. Edwards, an officer of this Court, previously disclosed all of these e-mails to another adversary, thereby eliminating any privilege or work product protection that ever could have been applicable to them, and then improperly withheld them from discovery by Epstein and what appears to be a deliberate concealment of them in a non-compliant privilege log, previously ruled by the Court to be legally deficient, based on false claims

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<sup>1</sup>The original Motion was filed on March 5, 2018, but not ruled on before the March 9, 2018, appellate court stay. The parties further agreed to stay hearings on pending motions until mediation was completed. Additionally, The Honorable Donald W. Hafele's stated interest in first allowing the Show Cause proceedings before The Honorable Raymond B. Ray, United States Bankruptcy Court for the Southern District of Florida, to occur before this Court proceeded with this review. With trial approaching on December 4, 2018, this Court instructed Epstein to file this Motion and deliver the accompanying sealed Memorandum by November 9, 2018. Edwards was instructed to deliver a response sealed Memorandum by November 16, 2018.

<sup>2</sup>Epstein has reduced the original 47 e-mails for *in camera* review down to 30 e-mails.

of irrelevancy and attorney-client privilege and claims of work product that could no longer possibly be applicable under Florida law.<sup>3</sup> Following this Court's *in camera* review, Epstein seeks a ruling from this Court that these 30 e-mails must be unsealed and properly included on Epstein's Exhibit List.

### **PREFACE**

The Bankruptcy Court, The Honorable Raymond B. Ray, entered an Order on October 29, 2018 (**Exhibit 1**), discharging the Order to Show Cause against Epstein in relation to the "disc" on which the e-mails were discovered. As of the time of this submission, Judge Ray has not yet determined whether Fowler White, Epstein's counsel at the time of the November 2010 Agreed Order (and from whom Link & Rockenbach, PA received the disc<sup>4</sup>), violated the Agreed Order. Edwards is hoping that this Court will refuse to conduct an *in camera* inspection because of a possible finding by Judge Ray that Fowler White negligently or inadvertently held the disc in its storage facility for some number of years. Even if Judge Ray makes such a determination, this Court should not excuse Edwards' (and Farmer Jaffe's) failure to produce all of these e-mails as they were required to do and represented they would in 2011.

Importantly, this Court has found that Link & Rockenbach, PA did nothing wrong relating to its discovery and use of the disc:

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<sup>3</sup>Farmer Jaffe agreed to produce all work-product related to closed cases to Epstein's attorneys.

<sup>4</sup>At the bankruptcy hearing and for the first time, Epstein's counsel learned from Lilly Sanchez's testimony that Fowler White was given two discs from the Farmer Jaffe firm to create two sets of hard copy documents that were bates stamped. This uncontroverted testimony demonstrated that the "disc" was created for Special Master Carney and not for Fowler White or Epstein. The disc was made because, according to Lilly Sanchez, Special Master Carney did not want 27,542 bates stamped pages of documents. Rather, Special Master Carney wanted a searchable disc. It is still a mystery how and when the disc came back into Fowler White's possession after it was sent to Special Master Carney and no evidence has been presented to resolve that question definitively.

- “I’m not finding fault with anything you or Miss Rockenbach or Miss Campbell did. That’s not the issue. You’ve done your job.” (March 8, 2018, Aft. Tr. 59:1-4.)<sup>5</sup>
- “So I again want to make clear that I’m finding absolutely no fault with Mr. Link, Miss Rockenbach, Miss Campbell or anyone else from the Link and Rockenbach firm in terms of what they did, albeit in the manner in which they had to do it and the timing, unfortunately, of the matter from their perspective in having to do it ...” (March 8, 2018, Aft. Tr. 61:15-21.)

### **IN CAMERA REVIEW**

Epstein requests that the 30 e-mails remain unsealed for the duration of the *in camera* inspection and counsel for both parties be allowed to review and present argument as to each e-mail. This is the same protocol agreed to by Farmer Jaffe in 2011 when the Special Master was contemplating this same review. That is, Farmer Jaffe agreed to turn over work product materials except for materials related to new or ongoing cases conditioned on a “For Attorneys’ Eyes Only” basis until such time as the Court overruled any privilege claim upon the Special Master’s (or Court’s) review with counsel present. (See **Exhibit 3.**)

During its *in camera* review, this Court must consider and determine:

1. The e-mails are directly relevant to the issues for trial and no *Binger*<sup>6</sup> “surprise in fact” exists regarding them;
2. If any work product protection existed, it was waived or excepted based on:
  - a. Farmer Jaffe’s express agreement to turn over all work product to Epstein’s attorneys;
  - b. Edwards’ production to Razorback victims/adversaries;
  - c. Edwards’ issue injection; and
  - d. Crime fraud exception;
3. The e-mails do not constitute attorney-client communications.

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<sup>5</sup>Excerpts of the March 8, 2018, afternoon hearing transcript are attached s **Exhibit 2.**

<sup>6</sup>*Binger v. King Pest Control*, 401 So. 2d 1310 (Fla. 1981).

## **BACKGROUND**

### **A. Discovery of Deliberately Concealed E-Mails**

As this Court is well aware, in February 2018, Link & Rockenbach, PA discovered documents that were voluntarily produced years ago by Edwards to his potential adversaries at the time – the Razorback plaintiffs. These e-mails directly contradict Edwards’ sworn testimony and positions taken by Edwards in this action. Importantly, the e-mails eviscerate Edwards’ claim for emotional distress damages, and worse – they illustrate that Edwards provided suspect testimony in this action about his anxiety over being sued by Epstein. They also directly contradict Edwards’ sworn testimony regarding interaction with Ponzi-schemer Scott Rothstein (“Rothstein”) and the strength/weakness of Edwards’ clients’ damage claims against Epstein, both which have become critical factual issues in this case.

First and foremost, the e-mails have become highly relevant in light of Edwards’ sworn testimony that Epstein’s lawsuit has caused him daily anxiety (emotional damages and credibility). Next, the e-mails are direct evidence controverting factual claims made by Edwards that he argues disproves probable cause, such as his interaction with Rothstein on the Epstein cases and the known “weakness” of the tort claimants’ damages. While the e-mails only became known to Epstein’s current counsel earlier this year, Edwards has known of them from the time of their existence! Moreover, the e-mails were produced by Edwards approximately eight years ago to counsel for Razorback, Edwards’ adversary at the time. Edwards, knowing how potentially damaging the e-mails are to him professionally, let alone their terminating effect on this lawsuit, has desperately taken multiple positions that Epstein’s current counsel improperly obtained the e-mails (proven to be untrue), that none of the e-mails were ever produced (incorrect), and that they are all protected



subject to attorney-client privilege (false) and/or the work product doctrine (waived or broken by exceptions if ever applicable).

**B. Edwards' Deceptively Concealed the E-Mails and Clearly Violated Rule 1.280(b)(6) as Previously Determined by the Court**

Edwards is responsible for improperly withholding these undeniably relevant e-mails from Epstein for more than eight years after specifically agreeing to turn over all work product to Epstein's lawyers. Specifically, Farmer Jaffe agreed:

[February 2, 2011] 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 3.)

Unfortunately, this promise to produce all work product was hollow. Although Farmer Jaffe did in fact turn over purported work product specifically relating to Edwards' three clients' cases against Epstein, which had then been settled in July 2010, it did not turn over the e-mails in question relating to those same cases. Further, in order to ensure that the e-mails would never see the light of the courtroom, Edwards concealed their existence by hiding them within a deceptively worded 1,607-entry, 159-page privilege log that this Court's predecessor, The Honorable David Crow, found to be insufficient on its face and not-compliant with the requirements of Florida Rule of Civil Procedure 1.280(b)(5)<sup>7</sup> and *TIG Ins. Corp. v. Johnson*, 799 So. 2d 339 (Fla. 4th DCA 2001).

Edwards has claimed that none of the documents on the disc that were listed on his privilege log had ever been produced. However, this is demonstrably inaccurate. Specifically, on May 7, 2012, Edwards produced 163 pages representing 89 documents identified on his 159-page privilege log. In addition, Edwards' counsel suggested that Link & Rockenbach received the evidence from

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<sup>7</sup>Florida 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.

attorney William Scherer (Razorback's counsel). Although that is inaccurate, it demonstrates that any potential work-product protection has been waived by virtue of production to at least one other potentially adverse party in separate litigation.

**C. The Truth and this Court's Process-Driven "Level Playing Field"**

This Court has repeatedly expressed its intention to preserve the integrity of the judicial process and maintain a level playing field between the parties in order to ensure a fair trial. Now is the time for process and this balance to yield the truth.

Consistent with this Court's efforts to level the playing field by allowing Edwards to introduce certain evidence bearing on Epstein's criminal history, his non-prosecution agreement with the government, settlements with Edwards' three clients and the existence and settlement of other civil claims against Epstein, this Court must allow the jury to review these 30 e-mails which would allow a full evaluation of Edwards' absurdly false anxiety damages claim, his conduct and the true value of his clients' cases as known by Edwards. The e-mails reveal as a sham Edwards' efforts to disprove Epstein's probable cause for believing Edwards' unusual litigation tactics were designed for an improper purpose, and leave undisputed and intact the extrinsic evidence on which Epstein reasonably relied as probable cause for the original action.

**ARGUMENT**

**A. The 30 E-mails are Relevant and Directly Controvert Edwards' Sworn Testimony and Repeated Misrepresentations to this Court**

The 30 e-mails are all undeniably relevant to this case. They eviscerate Edwards' damages claim and directly controvert Edwards' denials under oath and repeated representations before this Court regarding the weakness of Edwards' clients' damages claims against Epstein, Edwards' association and interaction with Rothstein and the litigation tactics in which Edwards improperly engaged, and they destroy the overall credibility of Edwards' allegations against Epstein. These e-

mails are not only relevant and material, but make it impossible for Edwards to establish any damages at all or to satisfy his heavy burden to prove the absence of probable cause for Epstein to have filed suit against him.

Edwards 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. As support for this assertion, Edwards sets up as the central issues (and issue injection) 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.

Epstein is entitled to have the Court and jury consider these e-mails as the jury 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). It is also crucial that these e-mails be available to the jury as they evaluate the factual issues that Edwards claims determine whether it was objectively reasonable or unreasonable to rely on the extrinsic evidence that Epstein proffers as probable cause.

**B. No Binger “Surprise in Fact” and Truth and Justice Requires the Courtroom’s Light**

There is no *Binger* prejudice and truth and justice require admissibility of these 30 highly relevant, case-ending e-mails either authored or received by Edwards, and undeniably within 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” - cannot claim “surprise.”<sup>8</sup>

The decision before this Court is one of right and wrong, and as this Court has acknowledged its task – “What is the right thing to do” which allows the Court to “look in the mirror at the end of the day,” and respond to one question: “Did I do the right thing by those who came before me...” – regardless of economic status or popularity of either party or his counsel. (11/2/18 Hearing Transcript, 88-89.) Edwards wrongly placed, and Edwards has advanced, an “attorney-client” label on the 30 e-mails with the intent that Epstein should never discover the existence of these devastatingly harmful documents, while at the same time allowing other adversaries access to these so called “privileged” e-mails.

Importantly, the attorney-client label is false because none of the 30 e-mails were to or from clients and none of the e-mails contain confidential information provided by Edwards’ three clients. Further, any information about Edwards’ clients’ past was all publicly available (and generally known) and even testified about by those very clients. Edwards also knows that Farmer Jaffe agreed to produce work-product e-mails in 2011 and, in fact, did so, including asserted work-product e-mails relating to Edwards’ three clients’ cases. Edwards’ hollow attorney-client privilege and work product assertions are now squarely challenged and must be rejected in favor of the truth. *See Loureiro v. State*, 133 So. 3d 948, 956 (Fla. 4<sup>th</sup> DCA 2013)(“A trial must be a search for the truth.”);

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<sup>8</sup>*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>.

*Katzman v. Rediron Fabrication, Inc.*, 76 So. 3d 1060, 1063 (Fla. 4<sup>th</sup> DCA 2011)(“...jury can the search for truth and justice be accomplished”).

Not only are the e-mails highly relevant and constitute no *Binger* “surprise in fact” to Edwards, as this Court has already glimpsed upon cursory review of the e-mails in March 2018, not a single one of the 30 e-mails are attorney-client privileged. Further, if any work product existed, it was either waived or is subject to a clear exception to such protection under the law. If this Court follows Edwards’ lead, a ruling shielding the jury from case-eviscerating e-mails would result in reversible error and lead to a second trial.

Because these e-mails are case-ending or worse for Edwards, Edwards has attacked Epstein’s counsel and derided the truth of these e-mails in an attempt to hide them from the light of the courtroom, but in the end, there it is: truth.

C. **Edwards Expressly Waived Work Product Protection in 2011 and His Deceptive Concealment of the 30 E-Mails on a Legally Deficient Privilege Log Violated Florida Law and Court Orders**

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 3.)

Gary Farmer, Jr. told the Special Master he would then only list on the new privilege log work product materials for *existing* cases and attorney-client privilege materials. *Id.* Farmer 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 4.)

[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 5.)

This representation was significant. At the time Farmer made this representation to Epstein in 2011, the three cases Edwards had been litigating against Epstein while he was Rothstein's partner at Rothstein Rosenfeldt & Adler ("RRA") were closed and had long been settled (in **July 2010**). Thus, based on Farmer's representation, Edwards was obligated, as an officer of the Court, 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 settled<sup>9</sup>, and none of those claims remain *pending against Epstein*.

In fact, Edwards did produce more than 5,000 pages as "attorneys' eyes only" in February 2011 (including asserted work product relating to the cases of his three clients that Edwards intends to feature in the prosecution of his malicious prosecution claim against Epstein). Epstein has now discovered that Edwards did not produce *select* items, and specifically withheld inculpatory e-mails pertaining to his closed cases against Epstein, despite his partner's representation to counsel and the Court (Special Master).<sup>10</sup> To the extent that the 30 e-mails identified for this Court relate to

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<sup>9</sup>Edwards settled his last clients' claims against Epstein in August 2011.

<sup>10</sup>In anticipation of Edwards' response that some work-product 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

actual cases Edwards litigated against Epstein, they were closed cases. If work-product protection ever even arguably applied to them, the e-mails should have been turned over for review by Epstein's counsel pursuant to Farmer Jaffe's agreement. Moreover, because all of Edwards' clients' claims against Epstein have now settled, in reliance on Edwards' previous waiver and agreement to produce the same, there is simply no basis for them not to be subject to review by this Court and a determination that any work-product protection that may at one time have been available is no longer applicable as a result of Edwards' clear and irrefutable waiver. *See Jane Doe No. 1 v. United States*, 749 F.3d 999 (11th Cir. 2014)(held that Epstein's former counsel had waived the work-product privilege with respect to documents sought by Edwards' clients, after having voluntarily sent allegedly privileged correspondence to the United States during plea negotiations).

Moreover, this Court's conclusion that Edwards' waiver of any protection is further mandated by his subsequent deliberate concealment of the e-mails in question on a 159-page privilege log that was determined by the 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 7.**) 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, who is

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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 6.**)

both an officer of the court, a plaintiff and counsel of record for himself in this action, should not be rewarded for such unethical gamesmanship and violation of court rules.

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 8**). Edwards failed to comply with the Court's Order and provide an accurate privilege log. His February 23, 2011 privilege log (**Exhibit 9**) is clearly invalid and the protections asserted thereunder must be deemed waived for any number of reasons, including 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 and worse – deliberately misleading. The privilege log 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 30 e-mails.



In light of Edwards' promise to turn "work-product" e-mails over coupled with his deliberately misleading and non-compliant privilege log and multiple instances of waiver regarding work product from closed cases, the Court need not make any further determinations other than to unseal the 30 e-mails and allow Epstein to use them at trial. Edwards' deceptive privilege log and subsequent disregard for the Court's Order mandating ("shall") a proper privilege log should not be rewarded by this Court, and requires a finding that Edwards has waived any claim of protection, particularly protection he has already waived or lost for a variety of other reasons discussed herein.

**D. Edwards Waived Any Attorney-Client and Work-Product Protection by Voluntary Disclosure to a Clear Adversary in the Razorback Litigation**

Additionally, Edwards' counsel conceded on March 8, 2018, that the e-mails were shared with the Conrad, Scherer law firm -- counsel for Razorback. (**Exhibit 2**, 15:1-16; 18:18-19:3). (*Also see* April 2011 communication between Edwards' counsel and Razorback's counsel, **Composite Exhibit 10**.) 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. Once Edwards provided the documents that he claims are privileged in this case (both attorney-client and work product) to Conrad, Scherer, an adversarial party's counsel, Edwards waived those privileges. *See* § 90.507, Fla. Stat.; *Delap v. State*, 440 So. 2d 1242, 1247 (1983). *See also Tucker v. State*, 484 So. 2d 1299, 1301 (Fla. 4th DCA 1986) ("The law is clear that once communications protected by the attorney-client privilege are voluntarily disclosed, the privilege is waived and **cannot be reclaimed.**") (emphasis added).

Recognizing his voluntary disclosure to *Razorback*, Edwards has defended against Epstein's claim of waiver by arguing "selective waiver" or "common interest." Edwards claimed that "Conrad & Scherer . . . entered into a joint prosecution agreement with Edwards' counsel, whereby both parties agreed to share information relative to their claims and/or defenses related to Scott

Rothstein without waiving privilege as to their communications or documents shared.” Edwards’ Supp. Resp. to Epstein’s Mot. to Declare Relevance, July 26, 2018, at 14. This is a claim of “selective waiver”—that Edwards may waive privilege as to one recipient while maintaining it as to others. However, every court that has recently addressed the logic and viability of “selective waiver” has concluded that it fails as inconsistent with the purpose of the attorney-client privilege. *Permian Corp. v. U.S.*, 665 F.2d 1214, 1221 (D.C. Cir. 1981). In addition, “[o]nce a party has disclosed work product to an adversary, it waives the work product doctrine as to all other adversaries.” *McMorgan & Co. v. First Cal. Mortg. Co.*, 931 F. Supp. 703 (N.D. Cal. 1996).

Case law from across the country demonstrates that the confidentiality agreement is of no merit because a litigant who chooses to disclose information claimed as confidential cannot have his cake and eat it too. Simply put, actions speak louder than words.

The general rule applies here. On March 8, 2018, Edwards’ counsel, Jack Scarola, implied (incorrectly) that the e-mails were shared with Epstein’s counsel by Mr. Scherer, counsel for Razorback. Thus, Edwards admits that he voluntarily furnished the e-mails to Mr. Scherer. Razorback sought these allegedly privileged communications to prove its allegations in the *Razorback* litigation that Rothstein used Edwards’ three cases against Epstein *to lure investors into Rothstein’s Ponzi scheme*. When Edwards produced these documents to Mr. Scherer, who was prosecuting an action against Rothstein and the firm, Edwards waived his claim to attorney-client privilege and work-product protection as to the whole world.<sup>11</sup> *See infra*.

Likewise, no “common interest” protection exists because the *Razorback* victims were outspokenly not aligned with Edwards. This is perhaps best illustrated in the hearing transcript before the United States Bankruptcy Court, Southern District of Florida, Case No. 09-34791-BKC-

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<sup>11</sup>Unless Edwards disclosed the information relating to his clients without their consent, which is unfathomable, then Edwards’ permitted disclosure waives it on their behalf as well.

RBR, in *In re Rothstein Rosenfeldt Adler, P.A.*, in which the following were statements made by William Scherer, Razorback's counsel:

- “[I]n November we filed a lawsuit in State Court and we alleged that as part of Mr. Rothstein and the firm, and the firm’s employees, and maybe some of the firm’s attorneys, conspired to use the Epstein/LM litigation in order to lure \$13.5 million worth of my victims, my clients, into making investments in these phoney [sic] settlements.” (17:7-14.)
- “In addition, as we have alleged, that Mr. Edwards and the firm put sensational allegations in the LM case that they knew were not true, in order to entice my clients into believing that Bill Clinton was on the airplane with Mr. Epstein and these young woman ...” (18:24-19:4.)
- “I can’t conceive that Mr. Edwards and the predecessor law firm would have any standing to prepare privilege logs or anything else, given what I just told the Court. That would be like having the fox guard the hen house.” (20:5-9.)
- “[The Complaint] names Rothstein. It does not name Mr. Edwards. It just names Rothstein, not the firm, and lays out the facts and says other people in the firm. We did not name them because we want to see the documents and see whether they had involvement.” (22:3-8.)
- “I support the same position that [Epstein] has asked the Court, and that is to have the trustee deal with this, get these documents and deal with it with you, rather than allow the successor law firm (i.e., Edwards’ law firm) to have them.” (22:19-24.)

(8/4/10 Hearing Transcript, **Exhibit 11.**)

It really is that simple. Edwards’ decision years ago (for whatever expedient or economic reason) to voluntarily give away the allegedly attorney-client privileged and work product e-mails to Conrad Scherer in the *Razorback* litigation triggered section 90.507. After taking steps inconsistent with the maintenance of privileges in confidential information, the privileges cannot be resurrected. They were waived.

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

Edwards has also waived attorney-client and work-product protections in the 30 e-mails under Florida's "at issue" doctrine (also known as "issue injection"). Related to the "at issue" doctrine is the "implied waiver" doctrine.

The "at issue" doctrine requires that a court find a waiver of attorney-client privilege. *Genovese v. Provident Life & Acc. Ins. Co.*, 74 So. 3d 1064 (Fla. 2011) (noting that privilege is waived where, for example, advice of counsel is raised as a defense and privileged communication is necessary to establish the defense). Under the "at issue" doctrine, "[A] party cannot hide behind the shield of privilege to prevent an opponent from effectively challenging pertinent evidence." *Carles Const. Inc. v. Travelers Cas. & Sur. Co. of Am.*, 56 F. Supp. 3d 1259, 1273 n.40 (S.D. Fla. 2014) (emphasis added).

Here, the e-mails are vital and necessary to defend against one or more elements of Edwards' malicious prosecution claim. Among other things, the e-mails *directly relate* to the credibility of Edwards' claim for damages based on "anxiety" he has allegedly suffered every single day of his life since December 2009 when Epstein's lawsuit was filed, and continues to suffer through today. (Edwards, 11/10/17, 11:21-12:16; 21:14-22:8; 23:5-16.)<sup>12</sup> In addition, the e-mails directly debunk Edwards' assertion that he had no involvement with Rothstein, that he acted properly in the litigation and that there is nothing to demonstrate any weakness in Edwards' now-settled three clients' cases against Epstein. Repeatedly, through his own sworn testimony and repeated misrepresentations before the Court, Edwards has made these central issues in his malicious prosecution Counterclaim against Epstein. Edwards' own statements in the e-mails are directly relevant and go to the heart of Epstein's ability to demonstrate that Edwards had no

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<sup>12</sup>Excerpts of Edwards' November 10, 2017, deposition transcript are attached as **Exhibit 12**.

damages, that any damages from anxiety as claimed by Edwards cannot be blamed on the allegations in the Complaint, but are attributable to Edwards' voluntary association with Rothstein and his own litigation activities in the Epstein cases, and that in the end, Edwards' claimed reasons that Epstein could not have *had* probable cause and acted with malice are plainly false. Therefore, they are critical to Epstein's defenses to Edwards' malicious prosecution claim and any work-product that may have applied to them must be deemed to have been waived.

**F. The Crime-Fraud Exception Applies to Some E-mails**

Under Florida law, there is no attorney-client privilege when the services of a lawyer are sought 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.; *see also* Fla. R. Prof'l Conduct 4-1.6 ("A lawyer must reveal confidential information to the extent the lawyer reasonably believes necessary . . . to prevent a client from committing a crime."). Following earlier precedent in *Parrott v. Wilson*, 707 F.2d 1262, 1271 (11th Cir. 1983), the Eleventh Circuit affirmed the part of the district court's order determining that the crime-fraud exception may be applied because an attorney's illegal or fraudulent conduct may, alone, overcome attorney work-product protection. *See Drummond Co., Inc. v. Conrad Scherer, LLP*, No. 2:11-cv-03695-RDP-TMP (11th Cir. March 23, 2018), at 23-24. (**Exhibit 13.**)

As further support for this crime-fraud argument and Rothstein's and Edwards' working together as alleged in Epstein's Complaint, Epstein directs the Court to his Memorandum filed under seal and the illustrative sampling of exhibits. This is more specifically explained in Epstein's Confidential Memorandum.

**G. No Attorney-Client Privilege Exists**

Farmer Jaffe, and now Edwards, misleadingly and repeatedly have advanced the “attorney-client privilege” label again and again in the hope that this Court will turn away and preclude the documents from jury consideration. Of the 1,607 claimed privilege items on Farmer Jaffe’s privilege log, 938 entries were labeled as “irrelevant and not reasonably calculated to lead to the discovery of admissible evidence,” while 994 entries were labeled as “work product and attorney-client privilege” (only 19 were communications with a client as determined by the description in the privilege log).

Despite Edwards’ and Paul Cassell’s (counsel for the Intervenor) protestations to the contrary, this Court can plainly see that not a single one of the 30 e-mails are attorney-client privileged communications between Edwards (or any other co-counsel) and Edwards’ and Mr. Cassell’s 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. A quick read of the 30 e-mails makes it easy to understand both that the e-mails do not in any way reflect attorney-client communications and that Edwards and Mr. Cassell have very significant personal and professional reasons that they do not want the e-mails to see the light of the courtroom. *See Buckley v. Am. Constitutional Law Found., Inc.*, 525 U.S. 182, 223, 119 S. Ct. 636, 657, 142 L. Ed. 2d 599 (1999)(“Sunlight is said to be the best of disinfectants; electric light the most efficient policeman.”” *citing Buckley v. Valeo, supra*, at 67, and n. 80, 96 S.Ct. 612 (quoting L. Brandeis, *Other People's Money* 62 (1933)).

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); *Witte v. Witte*, 126 So. 3d 1076 (Fla. 4th DCA 2012)(second exception applies to agents of the client such as a family member on behalf of an incapacitated relative). Not one of the 30 e-mails provides any basis to conclude that the documents constitute or reflect attorney-client communications in the rendition of legal services to a client. This Court’s *in camera* review of the 30 e-mails will easily confirm that no attorney-client privilege applies.

### CONCLUSION

Edwards, an officer of the court, the plaintiff in this case and counsel of record for himself, can claim no surprise for e-mails he authored, received or possessed since 2009 and deliberately and improperly concealed from disclosure to Epstein since February 2011. The 30 e-mails are relevant, directly controverting Edwards’ sworn testimony and repeated misrepresentations before this Court, and clearly none of them are attorney-client communications. Additionally, Edwards has waived the right to assert attorney-client privilege and work-product doctrine with respect to the 30 e-mails for all reasons set forth above. This Court is equipped with the controlling law and equitable principles to perform the now substantially narrowed request for an *in camera* review of the sealed 30 e-mails, and to confirm the critically relevant nature and admissibility of these e-mails based on the absence or waiver of any attorney-client privilege or work-product protection. The *in*

*camera* review will confirm that Edwards expressly waived all privilege in February 2011 and such documents should be deemed to have been produced by him. As directed by this Court, a memorandum outlining Epstein's positions with respect to the specific e-mails that are the subject of this Motion is being provided to this Court separately under seal for its consideration.

WHEREFORE, Counter-Defendant, Jeffrey Epstein, moves for this Court for an *in camera* review of the 30 e-mails, with counsel present to be heard, and for a ruling that no privilege exists, or that waiver or other reasons preclude any potential protection and the 30 e-mails may be identified by Epstein on his Exhibit List and introduced at trial.

**CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 9, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA  
1555 Palm Beach Lakes Boulevard, Suite 930  
West Palm Beach, Florida 33401  
(561) 847-4408; (561) 855-2891 [fax]

By: /s/ Scott J. Link  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Primary: Scott@linkrocklaw.com  
Primary: Kara@linkrocklaw.com  
Secondary: Tina@linkrocklaw.com  
Secondary: Troy@linkrocklaw.com

*Counsel for Counter-Defendant Jeffrey Epstein*



## SERVICE LIST

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	<p>Jay Howell  Jay Howell &amp; Associates  644 Cesery Blvd., Suite 250  Jacksonville, FL 32211  <a href="mailto:jay@jayhowell.com">jay@jayhowell.com</a>  <i>Limited Intervenor Co-Counsel for L.M., E.W.  and Jane Doe</i></p>

**EXHIBITS**


<b>Ex.</b>	<b>Date</b>	<b>Description</b>
1	10/29/18	<i>In re Rothstein Rosenfeldt Adler, P.A.</i> , U.S. Bankruptcy Court, Southern District of Florida, Case No. 09-34791, Order Discharging Order to Show Cause Against Jeffrey Epstein (D.E. 6508)
2	03/08/18	Afternoon Hearing Transcript Excerpt, pp. 15, 18, 19, 59, 61
3	02/02/11	E-mail from Gary Farmer to Robert Carney, Jack Scarola, Seth Lehrman, Lilly Sanchez, Joseph Ackerman and Brad Edwards
4	02/09/11	E-mail from Gary Farmer to Robert Carney, Joseph Ackerman, Lilly Sanchez, Jack Scarola, Christopher Knight, Seth Lehrman and Brad Edwards
5	02/16/11	Hearing Transcript Excerpt, p. 41
6	N/A	<i>Jane Doe v. United States</i> , U.S. District Court, Southern District of Florida, Case No. 9:08-cv-80736, Excerpt of Docket
7	05/07/12	Order on Jeffrey Epstein's Motion to Compel Production of Documents from Edwards and for Sanctions
8	08/17/12	Order on Outstanding Discovery Motions
9	02/23/11	Farmer Jaffe's Privilege Log
10	04/08/11 04/10/11	Communications between Conrad Scherer and Jack Scarola re production of documents
11	08/04/10	<i>In re Rothstein Rosenfeldt Adler, P.A.</i> , U.S. Bankruptcy Court, Southern District of Florida, Case No. 09-34791, Hearing Transcript
12	11/10/17	Bradley J. Edwards Deposition Transcript Excerpts, pp. 11-12, 21-23
13	03/23/18	<i>Drummond Company, Inc. v. Conrad &amp; Scherer, LLP</i> , United States Court of Appeal, Case No. 16-11090, 15-90031, Opinion

# EXHIBIT 1

NOT A CERTIFIED COPY



**ORDERED in the Southern District of Florida on October 29, 2018.**

  
Raymond B. Ray, Judge  
United States Bankruptcy Court

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

IN RE:

CASE NO. 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.

---

**ORDER DISCHARGING ORDER TO SHOW CAUSE AGAINST JEFFREY EPSTEIN**

On April 20, 2018, the Court entered its Order To Show Cause Why Fowler White And Jeffrey Epstein Should Not Be Held In Contempt And Scheduling Evidentiary Show Cause Hearing (ECF No. 6366) ("Order to Show Cause"). On October 25, 2018, the Petitioners, Farmer Jaffe Weissing Edwards Fistos & Lehrman, Bradley J. Edwards, and Intervenor L.M., filed their Notice of Joint Voluntary Dismissal of Jeffrey Epstein (ECF No. 6496). Based upon the above, the Court hereby discharges the Order to Show Cause against Jeffrey Epstein.

###

Submitted by:

Chad P. Pugatch, Esq.  
Rice Pugatch Robinson Storfer & Cohen, PLLC  
101 N.E. Third Avenue, Suite 1800  
Ft. Lauderdale, FL 33301  
Telephone: (954) 462-8000  
Telefax: (954) 462-4300  
[cpugatch@rprslaw.com](mailto:cpugatch@rprslaw.com)

Attorney Chad P. Pugatch, Esq., is directed to serve copies of this Order on all interested parties and file a certificate of service.

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# EXHIBIT 2

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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           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 the Bates numbers of these documents on that  
2 privilege log, you have an obligation, an ethical  
3 obligation, to turn them over to us, to turn them  
4 over now, and to make no use of those documents  
5 unless and until you have a court order that says  
6 otherwise. You need to tell us where did you get  
7 them, when did you get them, how did you get them,  
8 to whom have you distributed them? And those are  
9 questions that we still don't have answered.

10 What we get from the other side is, "Well,  
11 they could have come from here, they could have  
12 come from there, maybe they came from someplace  
13 else, we don't know." And if they don't know where  
14 they came from and that source is clearly a proper  
15 source, they have the burden in overcoming this  
16 privilege assertion to prove a waiver if they  
17 contend any waiver existed.

18 It wasn't with regard to Conrad Scherer  
19 because when those documents were turned over to  
20 Conrad Scherer -- and we have the letters that  
21 confirm the written agreement with every detail of  
22 that agreement in place -- those were turned over  
23 as part of a common interest privilege with an  
24 express representation it was attorneys' eyes only,  
25 with an express representation they would be turned

1 over to no one. Indeed, when they got turned over  
2 to Conrad Scherer, they were originally turned over  
3 with a confidentiality watermark on every document.

4 And then they contacted us back again and  
5 said, "We're trying to OCR all of these documents  
6 so that they are searchable, and we can't do that  
7 with the watermark on them. Can you please provide  
8 us with another copy without a watermark?" And we  
9 did that; again, trusting these officers of the  
10 court to abide by their agreement. And we have  
11 every reason to believe that Conrad Scherer did.  
12 They were not the source.

13 The obvious source, based now upon what we  
14 have been able to piece together, is very clearly  
15 Fowler White's improper retention of this material  
16 after they had been expressly ordered by the  
17 federal court not to retain any of it.

18 Now, every representation I have made to the  
19 Court, everything that is included on this timeline  
20 can be established through documents that pinpoint  
21 the dates and the identity of the individuals  
22 involved and the character of every disclosure that  
23 was made and every disclosure that was withheld.  
24 It has taken a substantial effort to put all of  
25 this together again. We have been working on this

1 file. How that could be the case, who knows? But  
2 I'm not finding fault with anything you or  
3 Miss Rockenbach or Miss Campbell did. That's not  
4 the issue. You've done your job.

5 MR. LINK: I understand. Your Honor, may I  
6 have one minute to confer with appellate counsel to  
7 make sure there's nothing I need to do to preserve  
8 this?

9 THE COURT: Absolutely. Let's just take a  
10 brief recess.

11 (Thereupon, a short recess was taken.)

12 - - -

13 THE COURT: All right. Thank you again.  
14 Please have a seat. Welcome back.

15 MR. SCAROLA: Your Honor, I want to hopefully  
16 tie up a few loose ends on the matter that has just  
17 been ruled on.

18 Am I correct in understanding that the  
19 defendant is prohibited from making any use of the  
20 724 late-disclosed exhibits?

21 THE COURT: Yes.

22 MR. SCAROLA: Next, sir, we would request the  
23 defendant be required to relinquish possession of  
24 all copies of the privileged documents to the Court  
25 under seal. They have expressed some concern

1 ability to weigh in somehow as to these critical  
2 issues.

3 Perhaps I'm being a bit naive when I say that  
4 having served Mr. Epstein in their capacity as  
5 counsel, it's my respectful belief that they owed  
6 an obligation to Mr. Epstein, if not this Court, to  
7 explain how and why they had access and kept these  
8 records in their possession in light of that court  
9 order and in light of this ongoing litigation. And  
10 as a matter of respect to Mr. Epstein and his  
11 ongoing legal team, to have made some type of  
12 affirmative steps to have dealt with this issue  
13 head on because of the apparent implications of  
14 same.

15 So I again want to make clear that I'm finding  
16 absolutely no fault with Mr. Link, Miss Rockenbach,  
17 Miss Campbell or anyone else from the Link and  
18 Rockenbach firm in terms of what they did, albeit  
19 in the manner in which they had to do it and the  
20 timing, unfortunately, of the matter from their  
21 perspective in having to do it, but that takes  
22 nothing away from what the Court has already  
23 remarked upon concerning the fact that now Fowler  
24 White in the representation of Mr. Epstein had  
25 these records from the inception is one of the

# EXHIBIT 3

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 discover 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.**

425 North Andrews Avenue, Suite 2


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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 31<sup>st</sup>, 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 4

NOT A CERTIFIED COPY

**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 and 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  
**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.**  
425 North Andrews Avenue, Suite 2  
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(954) 648-3903 cell

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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 5

NOT A CERTIFIED COPY

COPY

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 6

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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  
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Email: brad@pathtojustice.com  
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**Paul G. Cassell**  
Email: cassellp@law.utah.edu  
*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 - <b>Wrong Event Selected</b> ; 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)
04/09/2009	<u>37</u>	NOTICE by Jane Doe of <i>Change of Firm Affiliation</i> (Edwards, Bradley) (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)
09/13/2010	<u>39</u>	NOTICE by Jane Doe re <u>38</u> Administrative Order <i>In Response to Administrative Order Closing Case</i> (Edwards, Bradley) (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. <b>Two or More Document Events Filed as One</b> ; 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 7

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15<sup>th</sup> 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 1<sup>st</sup> day of April, 2012.

*may*

  
HONORABLE DAVID F. CROW  
CIRCUIT JUDGE

Copies furnished to:

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# EXHIBIT 8

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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 17<sup>th</sup>  
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 9

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UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
[www.flsb.uscourts.gov](http://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 Kuvn	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.



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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.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16874-16880	10/13/2009	Adam Horowitz	Jacquie Johnson	Depo	Joint W/P Priv.
16904-16905	10/14/2009	Spencer Kuvin	Jacquie Johnson	RE:Epstein	Joint W/P Priv.
16945	10/26/2009	Kikka Claudio	Jacquie Johnson	RE:Epstein depositions on 10/28	Joint W/P Priv.
17033-17034	10/26/2009	Kikka Claudio	Jacquie 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	Jacquie Johnson	Spencer Kuvin	FW:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
02071	08/18/2009	Adam Horowitz	Jacquie Johnson	RE:Epstein Sub to Bear Sterns	Joint W/P Priv.
02072-02078	09/04/2009	Jacquie 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.

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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 Kuvln	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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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 <sup>th</sup> hearing-WPB-Confidential	Joint-privilege
07003-07006	06/26/2009	Amy Ederi	Brad Edwards	June 25 <sup>th</sup> hearing-WPB-	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		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. Edwards	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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02420-02421	05/08/2009	Bradley Edwards	J. Mercedes Estrada	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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		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 <sup>th</sup> 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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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 <sup>th</sup> 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 <sup>st</sup> 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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05469	07/08/2009	Mercedes Estrada	Bradley Edwards	Judge Marra's July 6 <sup>th</sup> 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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
					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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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
08364-08368	10/01/2009	Jacque 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	Jacque 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	Jacque 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



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

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

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

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

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

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

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

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

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

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

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

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	Jacque 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

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

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

**Privilege Log – Dated 2-23-2011**  
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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



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

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

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

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

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

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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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.
<b>BOX 2</b>					

<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
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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					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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					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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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	Jacque 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	Jacque 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	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
04340-04342	09/04/2009	Jacque 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 <sup>th</sup>	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	Jacque 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	Jacque 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	Jacque 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	Jacque 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	Jacque 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	Jacquie 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	Jacquie 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	Jacquie 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	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
16394-16395	08/31/2009	Bradley Edwards	Jacquie 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	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
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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		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	Jacque 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	Jacque 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	Jacque 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	Jacque 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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					irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence; protected by privacy rights
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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					to the discovery of the admissible evidence; protected by privacy rights
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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					protected by privacy rights
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	Jacquie 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	Jacquie 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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					to the discovery of the admissible evidence; protected by privacy rights
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 Assest 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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 <sup>nd</sup> 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	Jacquie 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	Jacquie 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	Jacquie 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	Jacquie 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	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

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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 <sup>th</sup>	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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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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					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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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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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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					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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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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**Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman**

<b><u>BATES</u></b>	<b><u>DATE</u></b>	<b><u>TO</u></b>	<b><u>FROM</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>OBJECTION</u></b>
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	Jacquie 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

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

<b><u>BATES</u></b>	<b><u>DATE</u></b>	<b><u>TO</u></b>	<b><u>FROM</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>OBJECTION</u></b>
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



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

<b><u>BATES</u></b>	<b><u>DATE</u></b>	<b><u>TO</u></b>	<b><u>FROM</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>OBJECTION</u></b>
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

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# EXHIBIT 10



Ft. Lauderdale, Florida • Washington, DC • Quito, Ecuador

James D. Silver  
954.847.3324 Direct Line  
jsilver@conradscherer.com

April 8, 2011

VIA E-Mail: jsx@searceylaw.com  
Jack Scarola  
Searcy Denney Barnhart & Shipley  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Re: *Epstein/Rothstein/Edwards*

Dear Jack:

You sent me a proposal by letter dated April 7, 2011 regarding production to me and my firm of all of the documents that had been turned over to the Special Master, Judge Carney (the "Special Master"), in the special master process that has been on-going before Judge Ray in the RRA bankruptcy case. We spoke by telephone at length late today and reached agreement to your proposal, subject to the modified language that we discussed. I have taken the language from your letter and revised it below based on what we had discussed. Of course, I also had to change the language to reflect that the letter is now being written by me.

Accordingly, this letter is intended to confirm the terms and conditions of the production by your client, Bradley Edwards, to us of all documents, without redaction, and notwithstanding any claim of privilege made or that could be made, that the Bankruptcy Trustee Herbert Stettin caused to be turned over or delivered to the Special Master pursuant to the special master process described above and any further documents that Bradley Edwards has in his possession, custody or control responsive to our subpoena (collectively, the "Epstein Related Documents"). The terms and conditions of our agreement are as follows:

1. We will stipulate to stay enforcement of our current subpoena solely as it relates to the Epstein Related Documents subject to the terms and conditions of this agreement;
2. You will produce to us all of the Epstein Related Documents for an "attorneys eyes only" review with the express agreement that the production is pursuant to the common interest privilege and does not constitute a waiver of any privilege otherwise applicable to the documents;

Established 1974  
Rex Conrad 1935-1999 | William Scherer  
Conrad & Scherer, LLP | 633 South Federal Highway, Fort Lauderdale, Florida 33301  
Mailing Address | P.O. Box 14723, Fort Lauderdale, FL 33302  
Phone 954.462.5500 | Fax 954.463.9244  
www.conradscherer.com

3. We will preserve the strict confidentiality of all materials produced to us pursuant to this agreement unless:

- a. the same information is or was obtained from an independent source;
- b. you agree to release or modify the restriction on our use of particular materials or;
- c- we obtain a court order authorizing our use of the materials or determining that the materials in question are not privileged.
- d. we are compelled to produce or disclose the materials or information derived from them.

4. We agree that neither the documents themselves nor any information obtained from the documents produced to us pursuant to this agreement, subject to paragraph 3 above, will be shared with our clients unless they expressly agree to be bound by the terms and conditions of this agreement.

5. No copies will be made of the documents unless one or more of the conditions of paragraph 3 above have been satisfied, or to the extent we provide copies to a client or clients pursuant to paragraph 4 above;

6. Nothing in this agreement will restrict our disclosing any document(s) for *in camera* review in connection with any privilege objection you seek to maintain, or in connection with any request we make to use the documents without restriction and/or to determine that such documents are not protected from disclosure by any privilege or otherwise;

7. Stay of the enforcement of our subpoena may be lifted at any time to seek additional documents that may come into your possession or control or to satisfy the conditions of Paragraph 3c;

8. The terms of this agreement may be disclosed as we may deem appropriate, and we intend to disclose the terms to Judge Ray at Monday's hearing in connection with announcing our resolution of the issues that were to be considered at that hearing;

9. In the event that any third-party seeks to compel production of materials disclosed to us pursuant to this agreement, we will notify you immediately of such efforts and cooperate with you in preserving the confidentiality of documents you designate as privileged or not otherwise discoverable until such time as any one of the conditions set forth in paragraph 3 above have been satisfied;

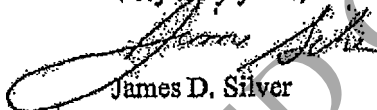
10. You have agreed to deliver the Epstein Related Documents to us immediately based on our agreement with you to the terms of this agreement; and

Jack Scorola  
April 8, 2011  
Page 3

11. Since this agreement relates to documents requested in a bankruptcy subpoena issued by us in the RRA bankruptcy case, it is agreed and understood that all disputes relating to this agreement as well as its enforcement will be determined exclusively by Judge Ray in the RRA bankruptcy case. Without limiting the foregoing, to the extent we seek to use or disclose any of the Epstein Related Documents (and you do not consent) and/or to obtain a determination of any issues relating to any claimed privilege regarding those documents, such determinations shall be made exclusively by Judge Ray in the RRA bankruptcy case.

If you agree with the terms and conditions set forth above, please sign this letter below and indicate that it is "Agreed" or send me an e-mail indicating your agreement.

Very truly yours,

  
James D. Silver

JDS/ra

**James D. Silver**

---

**From:** James D. Silver  
**Sent:** Sunday, April 10, 2011 12:45 PM  
**To:** 'Jack Scarola'  
**Cc:** brad@pathtojustice.com  
**Subject:** RE: Agreement regarding Epstein Related Documents

Jack,

Confirming our phone conversation of yesterday we now have an agreement and will appear at the hearing tomorrow morning where I will announce our agreement to Judge Ray. As for the issue regarding how the documents are to be provided, you will provide the electronic documents on disc and we can copy for ourselves from that disk as we deem appropriate. As for additional responsive documents that are not on disk, you agree that they can be copied by a copy service of my choosing, at my side's expense.

I am glad that we were able to amicably resolve our issues regarding the documents set forth in our letter agreement. Have a nice rest of your weekend and I will see you at bankruptcy court tomorrow morning.

Jim Silver

---

**From:** Jack Scarola [mailto:JSX@SearcyLaw.com]  
**Sent:** Saturday, April 09, 2011 12:41 PM  
**To:** James D. Silver  
**Cc:** brad@pathtojustice.com  
**Subject:** Re: Agreement regarding Epstein Related Documents

The letter agreement as redrafted by you is acceptable with one clarification regarding paragraph 10. Electronic documents will be provided on a disc. Hard copy documents will be made available for your inspection and copying at your expense- rather than we being required to "deliver" the documents to you.

----- Original Message -----

**From:** James D. Silver <JSilver@conradscherer.com>  
**To:** Jack Scarola  
**Sent:** Fri Apr 08 20:11:36 2011  
**Subject:** Agreement regarding Epstein Related Documents

Jack,

See attached letter and let me know if it accurately sets forth the terms of our agreement. As we were finalizing the document we had a computer issue and the Word version was lost. Due to the lateness of the hour we did not want to retype the entire letter. As a result, I was unable to correct the mistake in your e-mail address listed on my letter but the correct one is on this e-mail. Also, we had to whiteout the "y" in delivery on the second to last page of paragraph 9 since we couldn't correct it on the document. I wanted to let you know so that it does not look like the document had been altered.

Please let me know as soon as you can if we are in agreement. My cell number is 305-588-5664.

Jim Silver

\*\*\* eSafe scanned this email for malicious content \*\*\*  
\*\*\* IMPORTANT: Do not open attachments from unrecognized senders \*\*\*

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# **EXHIBIT 11**

<p style="text-align: right;">Page 1</p> <p>1 UNITED STATES BANKRUPTCY COURT 2 SOUTHERN DISTRICT OF FLORIDA</p> <p>3</p> <p>4 CASE NO.: 09-34791-BKC-RBR</p> <p>5 In Re:</p> <p>6 ROTHSTEIN ROSENFELDT ADLER, P.A., 7 Debtor.</p> <p>8</p> <p>9</p> <p>10</p> <p>11 MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM TRUSTEE 12 PURSUANT TO DOCUMENT PRODUCTION PROTOCOL ESTABLISHED 13 BY DE#672 (807); AMENDED MOTION FOR PROTECTIVE ORDER 14 (819)</p> <p>15 August 4, 2010</p> <p>16</p> <p>17 The above-entitled cause came on for 18 hearing before the HONORABLE RAYMOND B. RAY, 19 one of the Judges of the UNITED STATES BANKRUPTCY 20 COURT, in and for the SOUTHERN DISTRICT OF FLORIDA, 21 at 299 East Broward Blvd, Fort Lauderdale, Broward 22 County, Florida, on Tuesday, August 4, 2010, 23 commencing at or about 9:30 a.m., and the following 24 proceedings were had:</p> <p>25 Reported By: Margaret Franzen</p>	<p style="text-align: right;">Page 3</p> <p>1 THE COURT: Rothstein Rosenfeldt &amp; Adler. 2 All right. May I have appearances, please? 3 MR. LICHTMAN: Good morning, Judge. 4 Chuck Lichtman, Berger Singerman, for the trustee. 5 MR. NEIWIRTH: Good morning, your Honor. 6 Ronald Neiwirth, Fowler White Burnett, on behalf of 7 the movant, Epstein, and with me today are two of my 8 partners, Chris Knight and Lilly Ann Sanchez -- 9 MS. SANCHEZ: Good morning, your Honor. 10 MR. KNIGHT: Good morning, your Honor. 11 MR. NEIWIRTH: -- both of whom are more 12 familiar with the State Court angle on this than I 13 am, so they came along to be able to elucidate that 14 end of it. 15 MR. FARMER: Good morning, your Honor. 16 Gary Farmer on behalf of LM, Brad Edwards, and 17 the Farmer Jaffe Weissing law firm. We are an 18 interested party and have filed a motion for 19 protective order as to the subpoena that is at 20 issue here today. 21 THE COURT: All right. Insofar as the 22 TD Bank motion, Docket Entry 780, that has been the 23 subject matter of an agreed order that was submitted 24 to me. 25 MR. LICHTMAN: Correct, Judge.</p>
<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2 BERGER SINGEMAN, by 3 CHARLES H. LICHTMAN, ESQUIRE 4 on behalf of the Trustee</p> <p>5</p> <p>6 CONRAD &amp; SCHERER, by 7 WILLIAM R. SCHERER, ESQUIRE 8 on behalf of victims</p> <p>9</p> <p>10 FOWLER WHITE BURNETT, by 11 RONALD G. NEIWIRTH, ESQUIRE 12 LILLY ANN SANCHEZ, ATTORNEY-AT-LAW 13 CHRISTOPHER B. KNIGHT, ESQUIRE 14 JOSEPH L. ACKERMAN, ESQUIRE 15 on behalf of Jeffrey Epstein</p> <p>16</p> <p>17 FARMER JAFFE WEISSING EDWARDS PISTOS &amp; LEHRMAN, by 18 GARY FARMER, ESQUIRE 19 BRAD EDWARDS, ESQUIRE 20 on behalf of LM, Brad Edwards and 21 Farmer Jaffe Weissing Edwards Pistos &amp; Lehman</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 THE COURT: Mr. Scherer. 2 MR. SCHERER: Yes, sir, your Honor. 3 I'm William Scherer and I'm here on behalf of a 4 number of victims in the State Court action, as 5 well as the chairman of the creditors' committee 6 in the bankruptcy. 7 THE COURT: All right. That leaves us with 8 Docket Entry 807 and 819. 807 is Jeffrey Epstein's 9 motion. 10 MR. NEIWIRTH: Thank you, your Honor, and 11 again, good morning. We represent Jeffrey Epstein. 12 He has a civil claim pending in State Court in 13 Palm Beach County. He had served a subpoena on 14 Mr. Stettin requesting documents from the RRA estate. 15 That was back in April. 16 While this was still in process, in 17 May, under Docket Entry 672, your Honor entered 18 an order standardizing procedures for obtaining 19 discovery from Mr. Stettin and the RRA estate, 20 and at least on the face of it, it takes 21 jurisdiction over all discovery efforts against 22 the trustee. That left us in a quandary. 23 We had a subpoena pending in State 24 Court. We had correspondence from Berger 25 Singerman on behalf of the trustee that they had</p>

1 (Pages 1 to 4)

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(305) 358-8875





<p style="text-align: right;">Page 17</p> <p>input, please. MR. LICHTMAN: I'm going to let Mr. Scherer go first. MR. SCHERER: I think he wants me to go first. THE COURT: All right. MR. SCHERER: Your Honor, in November we filed a lawsuit in State Court and we alleged that as a part of Mr. Rothstein and the firm, and the firm's employees, and maybe some of the firm's attorneys, conspired to use the Epstein/LM litigation in order to lure \$13.5 million worth of my victims, my clients, into making investments in these phoney settlements. And as we alleged in that State Court proceeding, and we've sharpened the allegations as we've amended a few times, we allege that sometime in late October, that my clients were invited into the Rothstein firm with Mr. Rothstein, and he explained that he had a litigation going in State Court with Mr. Edwards representing LM, a victim of Mr. Epstein, and these are kind of sensational allegations and it's been printed widely. And my clients, a number of them and</p>	<p style="text-align: right;">Page 19</p> <p>allegations in the LM case that they know were not true, in order to entice my clients into believing that Bill Clinton was on the airplane with Mr. Epstein and these young woman and other personages, I can't remember who they are, and all sorts of other allegations that really were not even related to the LM case. And to the extent that any lawyers from the RRA firm, former lawyers, made a ton of money or however Mr. Farmer talked about it, we're interested in that ton of money because if they were involved in this scheme, this fraud, there's a crime fraud exception, and in addition, I want to see the ten boxes that they brought down. The trustee does not have those ten boxes. Those ten boxes were taken by Mr. Edwards when he left the law firm, I presume. So we want the ten boxes, we want all the communications and we want to look through everything on behalf of my State Court case, but also on behalf of the creditors' committee because the creditors' committee is looking to see if anybody else in the firm, other than Rothstein, was involved in this massive fraud that used the Epstein case. The model of using an existing case and</p>
<p style="text-align: right;">Page 18</p> <p>their lawyer, went into the Rothstein conference room and Mr. Rothstein brought down -- summoned the investigators, two of them, two or three of them, to bring down the Epstein file. And the lawyer that my clients brought from a national firm, went through the LM boxes, ten of them that the investigators brought down, and concluded that the Epstein case was a real case. And what Mr. Rothstein did with that real case, of course, is he told everybody that not only did he have the LM client of Mr. Edwards, that there were a number of other young ladies, that was widely published in the newspaper, that the firm was representing and that wanted to settle with Mr. Epstein on a confidential basis. So he used the real case in order to defraud my clients into investing into these phoney settlements and paid 13 and a half million dollars. I believe that Mr. Rothstein and others in the firm also told that story to a lot of other people, and let a lot of other people examine those ten boxes of the real case. In addition, as we have alleged, that Mr. Edwards and the firm put sensational</p>	<p style="text-align: right;">Page 20</p> <p>then spinning off a fraud from it is the same that was perpetrated on the Morse -- in the Morse situation, as has been alleged and widely produced. I can't conceive that Mr. Edwards and the predecessor law firm would have any standing to prepare privilege logs or anything else, given what I just told the Court. That would be like having the fox guard the hen house. That Epstein case is settled, and to the extent it's the ten boxes of stuff that we looked through, and I'll have to get the boxes to see if the attorney who looked through them, and how much time he spent looking through them --- THE COURT: Where are the ten boxes? MR. SCHERER: That's a good question. The trustee does not have the ten boxes. I presume the ten boxes are residing with the lawyers who took the case, Mr. Edwards and the successor law firm. The trustee does not have them. And then in addition, there's about 6,000 e-mails that the trustee has, and I bet you when we look at Qtask, there's going to be a boatload more. My clients were also advised during</p>

5 (Pages 17 to 20)

<p style="text-align: right;">Page 21</p> <p>1 their due diligence, short due diligence to 2 settle these cases with these young ladies -- 3 these putative young ladies who had to get the 4 money and leave town because of whatever the 5 stories were, that there were other members of 6 the firm that told my clients that they, indeed, 7 had even identified more of these victims that 8 Mr. Rothstein didn't even know about at that 9 time. So we know it wasn't just Mr. Rothstein 10 spinning the tale, there were a lot of people in 11 the firm. 12 We've alleged almost all of this in our 13 State Court action that we filed in November, up 14 to where we are right now, but, your Honor, I 15 think your Honor is going to have to deal with 16 these issues in this court and I would urge you 17 to have the trustee get involved and let the 18 trustee do its job with respect to whether there 19 are privileges that need to be protected, work- 20 product or attorney/client privileges, given 21 what's going on, and I believe the trustee will 22 be investigating whether the trustee wants to 23 bring any claims on behalf of the estate by 24 virtue of what I've just laid out for you. 25 Thank you.</p>	<p style="text-align: right;">Page 23</p> <p>1 to take those ten boxes to start with. 2 THE COURT: All right, Mr. Lichtman. 3 MR. LICHTMAN: Good morning, Judge. I'm 4 going to try to walk you through sort of 5 chronologically the trustee's perspective of what has 6 happened here. I think that what I've heard from all 7 the parties are comments that are correct, and not 8 necessarily correct, and I'm not suggesting 9 falsehoods. We just have kind of a different 10 perspective of some things and there are some points 11 that ought to be corrected. 12 Mr. Stettin received a subpoena in a 13 Palm Beach State Court action for production of 14 documents, and as we had done in virtually every 15 subpoena, we went to our forensic accountants, 16 the Berkowitz Diok Pollack &amp; Brant firm, and 17 said, okay, we need to produce e-mails and we 18 need to also then, with the staff that we have at 19 Berger Singerman and elsewhere, and look to see 20 if there are any hard documents that we can find, 21 notwithstanding what we'll call the issues as to 22 the RRA hard drive that contain client files. 23 We quickly realized that this is a 24 claim different than all of the other subpoenas. 25 The subpoenas that we had been receiving from</p>
<p style="text-align: right;">Page 22</p> <p>1 THE COURT: So your lawsuit in State Court 2 names these people as defendants? 3 MR. SCHERER: It names Rothstein. It 4 does not name Mr. Edwards. It just names 5 Rothstein, not the firm, and lays out the facts 6 and says other people in the firm. We did not 7 name them because we want to see the documents 8 and see whether they had involvement. 9 But the facts that I have alleged for 10 you, your Honor, is pretty much what I've alleged 11 in my first through third amended complaint in 12 State Court. 13 THE COURT: So, in essence, your position 14 in this matter would be to support the motion to 15 compel and deny the motion for protective order? 16 MR. SCHERER: Yes, sir, notwithstanding 17 that Mr. Epstein is a convicted pedophile. I 18 want to put that on the record. You know, he's 19 served his time and whatever, but I support the 20 same position that he -- that he has asked the 21 Court, and that is to have the trustee deal with 22 this, get these documents and deal with it with 23 you, rather than allow the successor law firm to 24 have them. 25 I don't know where they had the right</p>	<p style="text-align: right;">Page 24</p> <p>1 virtually every other party in the case were 2 requests for production of documents related to 3 claims that those moving parties or requesting 4 parties would have as it pertains to them trying 5 to recover some aspect of money as pertained to 6 the Ponzi scheme. 7 Okay. Like Mr. Scherer, who said I 8 need a bunch of documents, can you help us? So 9 we would enter into, on a one by one basis, a 10 protective order that was very, very tightly 11 negotiated. There is no standard form protective 12 order in this case, contrary to what everybody 13 has told you. We have a form that we use, and 14 everybody that has come to us, we said, we need 15 to have a protective order in place -- 16 THE COURT: We have Docket Entry 672, which 17 apparently is the document production protocol. 18 MR. LICHTMAN: We have that, yes, but then 19 we also, as an example, Document 685, have a 20 protective order that was entered with Mr. Scherer's 21 clients. We have, as an example, Document 715 that 22 pertains to MS Capital, and on and on. 23 So, in any event, what we realized is 24 the case with respect to the Epstein vs. Scott 25 Rothstein, Bradley Edwards case, is this is</p>

6 (Pages 21 to 24)

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# EXHIBIT 12

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

Case No. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually;  
BRADLEY EDWARDS, individually,

Defendants/Counter-Plaintiffs.

---

VOLUME I

VIDEOTAPED DEPOSITION

OF

BRADLEY EDWARDS

Taken on Behalf of Plaintiff

Friday, November 10th, 2017  
10:02 a.m. - 6:16 p.m.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409

Examination of the witness taken before

Sonja D. Hall  
Palm Beach Reporting Service, Inc.  
1665 Palm Beach Lakes Boulevard, Suite 1001  
West Palm Beach, FL 33401  
(561) 471-2995

1 A No.

2 MR. SCAROLA: Excuse me. Has there  
3 been a notice of withdrawal? Because I  
4 haven't seen it either.

5 MR. LINK: I think we represented it to  
6 Judge Hafele on Wednesday with the 8:45 when  
7 Kara was in front of them.

8 MR. SCAROLA: I have seen no notice of  
9 withdrawal. So as we sit here today, there  
10 are a total of, I think, six law firms that  
11 are representing Mr. Epstein.

12 BY MR. LINK:

13 Q And one really good one. The one you saw  
14 the card on this week, right?

15 Okay. So I want to focus on this anxiety.  
16 We all have anxiety in life, right? I wake up every  
17 morning with anxiety about something. How my kid's  
18 doing in college. Did he get home last night. Is  
19 my son going to get a hit today on the baseball  
20 team.

21 I want to talk about a different kind of  
22 anxiety. The anxiety that you feel in November 2017  
23 that relates back to the lawsuit that was filed in  
24 December 2009. Can you separate that anxiety that I  
25 am talking about?

1           A     Just an anxious feeling to get this over  
2     with.

3           Q     And you had that anxious feeling every  
4     single day from December 2009 through today  
5     November 10th, 2017?

6           A     The more reminders that I have of the case,  
7     and the fact that there still looms this false  
8     allegation over my head, that is clearly a trigger.

9           Q     You said it looms this false allegation.  
10    What is the false allegation looming over your head?

11          A     That I was a participant in a Ponzi scheme  
12    with one of the individuals that might be the most  
13    hated person in South Florida, especially amongst our  
14    profession.

15          Q     Mr. Rothstein?

16          A     Right.

17          Q     But why is there an allegation hanging over  
18    your head? The case against you was dismissed in  
19    2012, correct?

20               MR. SCAROLA: Excuse me. Which case?

21    BY MR. LINK:

22          Q     The case against you by Mr. Epstein was  
23    dismissed in 2012, was it not?

24          A     Right. The case was dismissed.

25          Q     Five years ago the case was dismissed,

1 Q 2017?

2 A Correct.

3 Q So I want to get back to anxiety. And you  
4 understand what I've meant that I have anxiety every  
5 day. Everybody in life has levels of anxiety. You  
6 agree with that?

7 A I suppose.

8 Q I had a lot of anxiety when I took the bar  
9 exam. You may not have.

10 A In some different form -- I think that's a  
11 word that's used that describes a bunch of different  
12 feelings.

13 Q Absolutely. I agree.

14 What I'm really trying to understand  
15 is -- I want to compartmentalize this. I'm focused  
16 now on 2012, once Mr. Epstein dismissed his claims  
17 against you in court. So from that date through  
18 today, that cloud is no longer hanging over your  
19 head. I would like to understand what your anxiety  
20 is that relates to the lawsuit filed in 2009. How  
21 it's impacting you on a day-to-day basis.

22 A It's hard for me to answer your question,  
23 while along the way I'm disagreeing with the various  
24 statements that you're making.

25 Q Tell me what you disagree with, sir.

1           A     You're making a statement the cloud is no  
2 longer over my head. That's the basis -- that's the  
3 predicate for your ultimate question. That's just not  
4 true.

5           Q     So as you sit here today, there's a cloud  
6 over your head as a result of the 2009 lawsuit that  
7 was filed that was dismissed in 2012?

8           A     For sure.

9           Q     And how does it impact you? What I am  
10 trying to understand is, you are going to ask the  
11 jury to award money to you based on your level of  
12 anxiety, right?

13                     That's one of the things you want the jury  
14 to do, is to say, I have anxiety and I want to be  
15 compensated.

16           A     As lawyers, what we have is our reputation.  
17 That's what was destroyed.

18           Q     We are going to get to reputation.

19           A     That's --

20           MR. SCAROLA: Excuse me. Please --

21           MR. LINK: I'm sorry. I apologize.

22                     I'm just trying to streamline this. We will  
23 get to reputation.

24           MR. SCAROLA: Well, what will

25                     streamline it is if you ask a question and



1           allow Mr. Edwards to complete his answer  
2           before you interrupt him.

3                   MR. LINK: I got it. Thank you.

4           BY MR. LINK:

5           Q     So I want to make sure that I understand --  
6           I want you to tell us -- you are asking the jury to  
7           award you an amount of money based on your having  
8           suffered every day anxiety as a result of the lawsuit  
9           that was filed in December 2009. Do I have that  
10          right?

11          A     Do you have that right? The anxiety is  
12          related -- directly related to the harm done to my  
13          reputation as a consequence of the filing of this false  
14          lawsuit making up that I am a criminal associated with  
15          who is known to be a terrible and horrible person. I  
16          mean, that is the -- the anxiety is related to that.

17          Q     I understand that generally. But I need to  
18          know specifically. Let me start by this.

19          How much are you asking the jury to award  
20          you for your day-in-and-day-out anxiety from  
21          December 2009 through today?

22          A     An amount of money that fairly and fully  
23          would measure the magnitude of the harm done to my  
24          reputation, and any consequential feelings that have  
25          resulted or continue to exist because of the damage

NOT A CERTIFIED COPY

# **EXHIBIT 13**

[PUBLISH]

IN THE UNITED STATES COURT OF APPEALS  
FOR THE ELEVENTH CIRCUIT

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Nos. 16-11090, 15-90031

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D.C. Docket No. 2:11-cv-03695-RDP-TMP

DRUMMOND COMPANY, INC.,

Plaintiff - Appellee,

versus

CONRAD & SCHERER, LLP,

Defendant - Appellant.

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Appeal from the United States District Court  
for the Northern District of Alabama

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(March 23, 2018)

Before WILSON, JILL PRYOR and BARTLE,\* Circuit Judges.

JILL PRYOR, Circuit Judge:

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\* Honorable Harvey Bartle III, United States District Judge for the Eastern District of Pennsylvania, sitting by designation.

Drummond, Inc., sued Conrad & Scherer, LLP (“C&S”), a law firm, and its partner, Terrence Collingsworth, for defamation. In this appeal, C&S seeks interlocutory review of the district court’s order concluding that the crime-fraud exception could defeat the firm’s and Collingsworth’s assertions in discovery of attorney-client privilege and attorney work product protection. The district court made a preliminary determination that the crime-fraud exception may apply to overcome their assertions of privilege and attorney work product protection and ordered a special master to perform an *in camera* review to determine whether the crime-fraud exception does apply. Although non-final orders generally are not immediately appealable, the district court certified its order for immediate appeal, and a motions panel of this Court granted C&S permission to bring an interlocutory appeal under 28 U.S.C. § 1292(b).

After full briefing by the parties and with the benefit of oral argument, we conclude that interlocutory review is appropriate to address only one aspect of the district court’s order. We vacate as improvidently granted the motion panel’s order in part and elect not to exercise our discretion to review the question posed in that part: whether the district court erred in applying agency principles to conclude that C&S intended to commit a crime or fraud and created attorney work product or

made communications in furtherance of the crime or fraud.<sup>1</sup> We decline to review this issue because it does not present a pure question of law suitable for review on an interlocutory basis under § 1292(b). Accordingly, we vacate the motion panel's earlier order in part and deny C&S's petition in part.

We do address the other issue on which interlocutory review was granted, whether the crime-fraud exception may be applied to overcome C&S's assertion, as a defendant in this case, that its materials related to other lawsuits where it served as counsel are protected as attorney work product when the firm's clients in those lawsuits were innocent of any wrongdoing.<sup>2</sup> This question presents the pure legal issue of whether work product protection may be invoked when a lawyer and law firm are found to have engaged in a crime or fraud but there is no such finding as to the client or clients they represented. Following our precedent and persuasive decisions from other circuits, we conclude that the crime-fraud exception may defeat work product protection in this circumstance. We thus affirm the part of the district court's order determining that the crime-fraud exception could be applied

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<sup>1</sup> As the merits panel, we have the authority to vacate as improvidently granted the motions panel's decision to permit the interlocutory appeal. *See McFarlin v. Conseco Servs., LLC*, 381 F.3d 1251, 1253 ("Like all motions initially ruled upon by a motions panel, [an order by a motions panel granting permission for an interlocutory appeal under § 1292(b)] is subject to being vacated as improvidently granted by the merits panel to which the case is assigned for decision."); *see also* 11th Cir. R. 27-1(g) ("A ruling on a motion or other interlocutory matter . . . is not binding upon the panel to which the appeal is assigned on the merits, and the merits panel may alter, amend, or vacate it.").

<sup>2</sup> We note that this issue does not concern materials claimed to be protected by the attorney-client privilege.

to overcome C&S's claim of work product protection for materials related to lawsuits where C&S served as counsel despite the fact that its clients were innocent of wrongdoing.

## **I. FACTUAL AND PROCEDURAL BACKGROUND**

This appeal arises out of a complex dispute that began when Collingsworth, a C&S partner, represented Colombian citizens who sued Drummond, an Alabama company, in federal court in Alabama, alleging that Drummond had supported paramilitary groups in Colombia that murdered private citizens. To provide the necessary context for our discussion, we recount the relevant history of the Colombian citizens' lawsuits against Drummond and Drummond's later lawsuit against Collingsworth and C&S.

### **A. Collingsworth and C&S's Representation of Colombians Suing Drummond**

In his law practice, Collingsworth primarily represents victims of human rights abuses. He joined C&S as a partner to litigate such cases. Although the firm is based in Florida, he worked out of and managed its Washington D.C. office.

While a partner at C&S, Collingsworth filed on behalf of Colombian citizens several lawsuits (the "alien tort cases") against Drummond, which operates coal mines around the world, including in Colombia. The plaintiffs sued Drummond under the Alien Tort Statute, 28 U.S.C. § 1350, and the Torture Victim Protection

Act of 1991, Pub. L. No. 102-256, 106 Stat. 73 (1992) (codified at 28 U.S.C. § 1350 note), alleging that Drummond hired members of the paramilitary to provide security services around its mines in Colombia and that these individuals, acting as the agents of Drummond, killed civilians in violation of the laws of nations. *See generally Doe v. Drummond Co.*, 782 F.3d 576, 579-81 (11th Cir. 2015).

Collingsworth acted as the lead C&S attorney in these cases. William Scherer, the firm's managing partner, and other C&S attorneys entered appearances in the cases. As managing partner, Scherer delegated to Collingsworth the authority to litigate the cases.

To support the claims against Drummond, Collingsworth developed evidence connecting Drummond to the paramilitary's violent actions. He secured testimony from several former members of the paramilitary, including Jairo de Jesus Charris, Libardo Duarte, Jose Gelvez Albarracin, Alcides Manuel Mattos Tabaraes ("Samario"), and Jhon Jairo Esquivel Cuadrado ("El Tigre"). These witnesses offered testimony that implicated Drummond. Additionally, Collingsworth relied on testimony from Jamie Blanco, who worked as a contractor for Drummond in Colombia. Blanco testified that Drummond sent him money that he was directed to use to pay the paramilitary for security services.

In the alien tort cases, Drummond sought discovery about whether the plaintiffs or their attorneys had paid or given anything of value to these witnesses in exchange for their testimony. In response, the plaintiffs identified three witnesses who had been paid—Charris, Duarte, and Gelvez.<sup>3</sup> The plaintiffs claimed these payments were made to provide security to the family members of the witnesses who were in danger as a result of the witnesses' testimony. The plaintiffs in the alien tort cases did not identify any payments they made to Samario, El Tigre, or Blanco.

Ultimately, Drummond prevailed in each of the alien tort cases.<sup>4</sup> But the dispute between Drummond, on the one hand, and C&S and Collingsworth, on the other, was only beginning.

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<sup>3</sup> The plaintiffs also identified a fourth potential witness who received money from C&S, but C&S stopped paying this potential witness when it determined that he was not credible and would not be used as a witness.

<sup>4</sup> *Balcero Giraldo v. Drummond Co.*, No. 2:09-CV-1041, 2013 WL 3873960 (N.D. Ala. July 25, 2013) (granting summary judgment in favor of Drummond), *aff'd sub nom. Doe v. Drummond Co.*, 782 F.3d 576 (11th Cir. 2015); *Baloco v. Drummond Co.*, No. 7:09-CV-00557, 2012 WL 4009432 (N.D. Ala. Sept. 12, 2012) (dismissing case in part and granting summary judgment in favor of Drummond), *aff'd* 767 F.3d 1229 (11th Cir. 2014); Order, *Melo Penaloza v. Drummond Co.*, No. 2:13-cv-393 (N.D. Ala. Jan. 26, 2016), ECF No. 59 (dismissing case with prejudice), *aff'd in part, rev'd in part, vacated in part, and remanded with instructions* 662 F. App'x 673 (11th Cir. 2016).



**B. Drummond's Defamation Action Against Collingsworth and C&S**

1. Drummond Files a Defamation Action and Seeks Discovery About Witness Payments.

While the alien tort cases were pending, Collingsworth wrote letters on C&S stationery to the Dutch government and a Japanese company accusing Drummond of supporting paramilitary groups that murdered hundreds of Colombian citizens. After Collingsworth sent these letters, Drummond sued Collingsworth and C&S for defamation in federal court in Alabama (the "defamation case").

At the beginning of the defamation case, Collingsworth and C&S were jointly represented by outside counsel. Because of Collingsworth's central role in the underlying litigation and in writing the allegedly defamatory letters, he was the C&S partner primarily responsible for working with outside counsel. In their joint answer, Collingsworth and C&S denied liability and raised several defenses, including that the statements in the letters were true and that they had not acted maliciously.

Attempting to prove that Collingsworth had known the statements in his letters were false and that he had acted with malice, Drummond served discovery requests about the methods Collingsworth and his litigation team had used in the alien tort cases to secure testimony from the witnesses, including information about any payments made to the witnesses. Collingsworth and C&S responded that they had previously disclosed all payments made to witnesses, pointing to their

disclosures that payments had been made to Charris, Duarte, and Gelvez. In hearings and other filings with the district court, Collingsworth and C&S's outside counsel repeated that only Charris, Duarte, and Gelvez had received payments.

2. Through Discovery, Additional Witness Payments Are Uncovered.

As it turns out, all of these statements made in discovery were false. Eventually, Collingsworth and C&S admitted that El Tigre, Samario, and Blanco had also received payments. The payments were uncovered after Drummond subpoenaed a law firm that had served as C&S's co-counsel in the alien tort cases. That law firm produced an email showing that Collingsworth had asked co-counsel and Scherer for permission to pay approximately \$100,000 in attorney's fees on Blanco's behalf in a pending criminal case in Colombia. The co-counsel, copying Scherer, directed Collingsworth not to pay the fees because they would have to disclose these payments in the alien tort cases, which would damage Blanco's credibility and likely be seen as bribery.

Drummond used this email, which Collingsworth and C&S had failed to produce in discovery, to argue that Collingsworth and C&S had been hiding information about witness payments. A few months later, Collingsworth and C&S admitted that El Tigre, Samario, and Blanco had received payments.

At Collingsworth's direction, C&S had sent and continued to send Samario and El Tigre \$1,000 each per month. C&S wired the money from its operating

account to an intermediary in Colombia, who delivered the money to Samario and El Tigre. C&S began making these payments during the alien tort cases and continued to make them while the defamation case was ongoing.

Multiple partners and employees at C&S were aware of these payments. Shortly after the monthly payments began, Collingsworth sent an email to his co-counsel in the alien tort cases, copying Scherer, informing them that El Tigre and Samario would receive money each month until they were deposed. This email was forwarded to Scherer's son, another C&S partner, who then apparently had an associate research the propriety of witness payments. C&S employees who were responsible for sending the monthly wires also were aware that C&S was sending money to the intermediary to pay El Tigre and Samario.

Blanco received no money directly from C&S or Collingsworth; instead, he received money from Albert van Bilderbeek, another Colombian client of Collingsworth's. After being told by co-counsel not to pay Blanco's attorney's fees, Collingsworth introduced Blanco to van Bilderbeek. Van Bilderbeek subsequently paid \$150,000 of Blanco's legal fees. While these payments were being made, Collingsworth served as intermediary between Blanco and van Bilderbeek. At one point, Blanco—waiting for money from van Bilderbeek—told Collingsworth that he would not finalize his declaration until van Bilderbeek paid

him. After van Bilderbeek paid, Blanco signed a declaration that Collingsworth used in the alien tort cases.

3. Drummond Seeks Sanctions and Raises the Crime-Fraud Exception.

After C&S and Collingsworth disclosed these additional witness payments, Drummond moved for sanctions, asserting that Collingsworth and C&S had made false statements to the court by failing to disclose these payments.<sup>5</sup> The court allowed Drummond to depose Collingsworth and Scherer about the witness payments and related issues.

At his deposition, Collingsworth admitted that there had been payments made to witnesses that he and C&S had failed to disclose. With regard to the payments to El Tigre and Samario, Collingsworth testified that he had forgotten about the payments to the witnesses because they were made through an intermediary. With regard to van Bilderbeek's payments to Blanco for legal fees, Collingsworth claimed that he failed to disclose the payments because he thought that he had only been asked to identify payments that he made directly to witnesses, rather than payments made by third parties like van Bilderbeek. Scherer, who was deposed as the representative of C&S, explained that he had not

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<sup>5</sup> As sanctions, Drummond asked the court to enter a default judgment against Collingsworth and C&S, hold Collingsworth in contempt of court, and award Drummond its reasonable attorney's fees.

known about the witness payments and that once he learned of the payments, he made sure that C&S promptly disclosed them to the court.

Although Collingsworth and Scherer provided this general information, they refused to answer many categories of questions posed in discovery, claiming that the information Drummond sought was protected by the attorney-client privilege or the attorney work product doctrine. For example, Collingsworth refused to answer questions regarding communications about the witness payments that he had had with Ivan Otero, a Colombian attorney who served as a conduit for payments from C&S to El Tigre and Samario, or to identify who was involved in drafting the filings in the defamation action that contained misrepresentations about the witness payments. And Collingsworth and Scherer refused to answer questions about what caused them to realize that they had made inaccurate statements about the witness payments or the process that led them to correct their misstatements, claiming the information sought was privileged or protected from discovery. Drummond asked the court to hold that the crime-fraud exception vitiated Collingsworth and C&S's claims of attorney-client privilege and work product protection.

4. The District Court Applies the Crime-Fraud Exception.

After a hearing, the district court issued an order applying the crime-fraud exception to both Collingsworth and C&S. In reaching this conclusion, the district

court followed our circuit's two-part test for applying the crime-fraud exception and determined that Drummond had (1) made a prima facie showing that Collingsworth and C&S had engaged in criminal or fraudulent conduct when seeking the advice of counsel and creating attorney work product in the alien tort and defamation cases and (2) identified categories of communications and attorney work product that may not be protected from discovery because they were used to further a crime or fraud.

First, the district court pointed to evidence that both Collingsworth and C&S had engaged in criminal or fraudulent conduct when they sought the advice of outside counsel in the defamation case and created attorney work product in both the alien tort and defamation cases. The district court determined that the crime-fraud exception's first prong was satisfied as to three crimes: fraud on the court, witness bribery, and suborning perjury. The court emphasized that it was not holding that a crime or fraud actually had been committed, but only that a prima facie case had been established.

In determining that there was a prima facie case of fraud on the court, the district court identified numerous false statements Collingsworth and C&S had made to the court. The court identified misstatements regarding witness payments that Collingsworth had made to the court in the alien tort cases when he was acting as a C&S partner, as well as misstatements that Collingsworth and outside counsel

had made in the defamation action. The court found that both Collingsworth and C&S had made these false statements knowingly.

In a lengthy footnote, the district court explained that there was sufficient evidence to find that C&S had knowingly made misstatements. First, the court explained that because Collingsworth was a partner in C&S and was acting for the firm's benefit, his actions and knowledge were attributable to the firm under agency principles. Second, the court cited evidence showing that other firm partners and employees, including Scherer, had been aware of the monthly payments being made to the witnesses and explained that it was unbelievable that no one at the firm other than Collingsworth had known of the payments.

As for the witness bribery and suborning perjury crimes, the district court determined that Drummond had established a prima facie case with evidence showing that the witnesses had received payments from the litigation team under suspicious circumstances. The court once again relied on agency principles to establish the prima facie showing that C&S had bribed witnesses and suborned perjury, explaining that every action taken by Collingsworth in the case had been in his capacity as a partner and agent of C&S.

The district court then turned to the second prong of the test, which required a showing that the communication was made or attorney work product was created in furtherance of the criminal or fraudulent activity. Because the court did not

have before it the specific materials that Collingsworth and C&S claimed were privileged or protected from discovery, in lieu of a document-by-document analysis the court considered whether the categories of discovery Drummond sought were sufficiently related to the allegations of fraud, witness bribery, and suborning perjury. The court found that each category of discovery Drummond identified was sufficiently related to the allegations of fraud on the court, witness bribery, and suborning perjury. These categories of information included:

- Collingsworth's communications with Ivan Otero, the Colombian attorney who served as the intermediary for payments from C&S to El Tigre and Samario and from van Bilderbeek to Blanco;
- Collingsworth and C&S's withholding and redaction of documents produced to Drummond in the defamation case showing payments to El Tigre and Samario;
- Collingsworth and C&S's drafting of pleadings and papers in the alien tort and defamation cases that included misrepresentations regarding the scope, nature, and extent of witness payments;
- Collingsworth's email informing Scherer and his co-counsel that Samario and El Tigre would receive ongoing monthly payments and what was done with the email after it sent;
- Collingsworth's communications with attorney Paul Wolf about witness payments;
- Collingsworth's disclosure of payments to El Tigre, Samario, and Blanco to outside counsel in the defamation case;
- Collingsworth's payment of \$100,000 to a consulting attorney in Colombia who assisted in obtaining access to prisoners in Colombia in order to interview and depose them in the alien tort cases;



- Collingsworth's communications with van Bilderbeek regarding payments to Blanco; and
- Collingsworth and C&S's search for documents in the defamation case.

After determining that the crime-fraud exception may apply, the district court ordered a special master to review *in camera* the documents that Collingsworth and C&S claimed were privileged or protected as attorney work product to determine whether each individual document was in furtherance of or closely related to a fraud on the court or crime and therefore should be produced to Drummond. The court also set forth a procedure for the special master to assess a witness's assertion of attorney-client privilege or attorney work product protection in a deposition. The court directed that when necessary a witness should give *in camera* testimony, potentially *ex parte*, so that the special master could appropriately assess any privilege issues while limiting disclosure only to information used or created in furtherance of the crime or fraud.

After explaining why the crime-fraud exception applied, the district court certified that its order involved controlling questions of law as to which there may be a substantial ground for difference of opinion and that an immediate appeal may materially advance the litigation. In addressing certification, the district court did not identify the specific controlling questions of law that it believed warranted interlocutory review.

5. A Motions Panel of This Court Granted C&S Permission for an Interlocutory Appeal.

Collingsworth and C&S filed separate petitions for review with our Court, seeking permission to file interlocutory appeals from the district court's order. A motions panel denied Collingsworth's petition. A separate motions panel granted C&S's petition as to the following two questions:

1. Can agency principles be used to impute the application of the crime-fraud exception to an agent's principal where the principal has separately-held privileges as a co-defendant in the suit and there is no finding that the exception applies directly to the principal?
2. Can agency principles be used to impute the application of the crime-fraud exception to an agent's principal where the agent is operating as an attorney and there is no finding that the client's behavior triggered the crime-fraud exception or that the exception applies directly to the principal?

**II. BACKGROUND ON THE ATTORNEY-CLIENT PRIVILEGE, ATTORNEY WORK PRODUCT DOCTRINE, AND CRIME-FRAUD EXCEPTION**

The issues in this appeal center on how the attorney-client privilege, attorney work product doctrine, and crime-fraud exception apply to a partnership and what role, if any, agency principles play in the application of the crime-fraud exception. To provide context for these issues, we pause for background on the attorney-client privilege and the attorney work product doctrine, as well as the crime-fraud exception.

The attorney-client privilege attaches, of course, to confidential communications between an attorney and client for the purposes of securing legal advice or assistance.<sup>6</sup> See *In re Grand Jury Investigation*, 842 F.2d 1223, 1224 (11th Cir. 1987). The purpose of the privilege is “to encourage full and frank communication between attorneys and their clients and thereby promote broader public interests in the observance of law and administration of justice.” *United States v. Zolin*, 491 U.S. 554, 562 (1989) (internal quotation marks omitted).

Attorney work product protection extends to material obtained or prepared by counsel in the course of their legal duties provided that the work was done with an eye toward litigation.<sup>7</sup> See Fed. R. Civ. P. 26(b)(3)(A); *Cox v. Adm’r U.S. Steel & Carnegie*, 17 F.3d 1386, 1421-22 (11th Cir. 1994). Work product protection prevents most inquiries into an attorney’s work files and mental impressions. *Hickman v. Taylor*, 329 U.S. 495, 510 (1947). The purpose of this protection is to protect the integrity of the adversary process by allowing a lawyer to work “with a

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<sup>6</sup> There are two sets of attorney-client communications claimed to be privileged that are potentially at issue in this appeal. First, there are communications between C&S and its clients in Colombia in the alien tort cases. Second, there are communications between C&S and its outside counsel in the defamation case. In the first category, C&S is serving as the attorney; in the second C&S is the client. With respect to the attorney-client privilege, as opposed to the protections for attorney work product, Drummond seeks discovery of attorney-client privileged materials only from the defamation case—that is, Drummond seeks to use the crime-fraud exception to pierce the attorney-client privilege only with respect to communications where C&S was the client. We thus do not address whether the crime-fraud exception could apply to privileged communications between C&S and its clients in Colombia, who are not alleged to have participated in any wrongdoing.

<sup>7</sup> With respect to attorney work product, Drummond seeks to discover materials from both the alien tort and defamation cases that C&S claims are protected.

certain degree of privacy, free from unnecessary intrusion by opposing parties and their counsel.” *Id.*

But the protection afforded to work product is not absolute. Discovery may be had into factual work product upon a party showing “substantial need for the materials to prepare its case” and that it “cannot, without undue hardship, obtain their substantial equivalent by other means.” Fed. R. Civ. P. 26(b)(3)(A). Greater protection is given to the attorney’s opinion work product—that is, materials containing “the mental impressions, conclusions, opinions, or legal theories of a party’s attorney or other representative concerning the litigation.” Fed. R. Civ. P. 26(b)(3)(B). Such materials “enjoy[] a nearly absolute immunity and can be discovered only in very rare and extraordinary circumstances.” *Cox*, 17 F.3d at 1422 (internal quotation marks omitted).

The crime-fraud exception allows a party—in rare circumstances—to obtain discovery that otherwise would be protected by the attorney-client privilege or the attorney work product doctrine. The crime-fraud exception applies when a two-part test is satisfied:

First, there must be a prima facie showing that the client was engaged in criminal or fraudulent conduct when he sought the advice of counsel, that he was planning such conduct when he sought the advice of counsel, or that he committed a crime or fraud subsequent to receiving the benefit of counsel’s advice. Second, there must be a showing that the attorney’s assistance was obtained in furtherance of the criminal or fraudulent activity or was closely related to it.

*In re Grand Jury Investigation*, 842 F.2d at 1226. Stated simply, the crime-fraud exception removes the “seal of secrecy” from attorney-client communications or work product materials when they are made in furtherance of an ongoing or future crime or fraud. *Zolin*, 491 U.S. at 563; *see Cox*, 17 F.3d at 1422 (recognizing that the crime-fraud exception “applies to work-product in the same way that it applies to the attorney-client privilege”). When the crime-fraud exception applies, an attorney’s opinion work product is discoverable. *Cox*, 17 F.3d at 1422. With these principles in mind, we now turn to the questions raised in this appeal.

### **III. SCOPE OF INTERLOCUTORY REVIEW UNDER § 1292**

The federal courts of appeals “have jurisdiction of appeals from all final decisions of the district courts of the United States.” 28 U.S.C. § 1291. “A final decision is one by which a district court disassociates itself from the case . . . .” *Doe No. 1 v. United States*, 749 F.3d 999, 1004 (11th Cir. 2014) (internal quotation marks omitted). It “ends the litigation on the merits and leaves nothing more for the court to do but execute the judgment.” *Id.* (internal quotation marks omitted). “Discovery orders are ordinarily not final orders that are immediately appealable.” *Id.*

There are, however, exceptions to the rule that only final decisions are appealable. We have discretion to hear interlocutory appeals from district court orders under the certification procedure in 28 U.S.C. § 1292(b):

When a district judge, in making in a civil action an order not otherwise appealable under this section, shall be of the opinion that such order involves a controlling question of law as to which there is substantial ground for difference of opinion and that an immediate appeal from the order may materially advance the ultimate termination of the litigation, he shall so state in writing in such order. The Court of Appeals which would have jurisdiction of an appeal of such action may thereupon, in its discretion, permit an appeal to be taken from such order, if application is made to it within ten days after the entry of the order . . . .

28 U.S.C. § 1292(b). We have explained that when deciding whether to permit an appeal under § 1292(b) after a district court has entered an order certifying the appeal and a party has filed a timely application for permission to appeal, we are considering not whether we have jurisdiction to hear the appeal but instead whether to exercise our discretion under § 1292(b). *See McFarlin v. Conseco Servs., LLC*, 381 F.3d 1251, 1255 (11th Cir. 2004).

Our precedent identifies several principles to guide us when deciding whether to exercise our discretion under § 1292(b) to allow for a rare interlocutory appeal. *Id.* at 1264. In general, we exercise our discretion only when (1) the appeal presents a pure question of law, (2) the question is controlling of at least a substantial part of the case, (3) the district court identifies the question in its order, (4) there are substantial grounds for differences of opinion on the question, and (5) resolution of the question may reduce the amount of litigation necessary on remand. *Id.* But even if all of these factors are present, we still have discretion to disallow the appeal. *See id.*

After considering these guiding principles, we conclude that the motions panel improvidently granted permission to appeal, vacate in part that earlier order, and decline to exercise our discretion to decide the first question presented in this appeal. Paraphrased, the first question asks whether a court may apply the crime-fraud exception to a partnership by imputing to the partnership the actions and knowledge of a partner. C&S argues that the district court improperly used agency principles to impute Collingsworth's intent to commit a fraud or crime to C&S in determining that a crime or fraud occurred and that the relevant communications or work product were made in furtherance of that fraud.

At first blush, the core issue of whether, in applying the crime-fraud exception, a court may impute a partner's knowledge and intent to a partnership appears to raise a purely legal question. But C&S concedes that in some circumstances, such as when a firm's managing partner or partner charged with responsibility to make the decisions at issue participates in the fraud, a partner's intent *may* be imputed to the partnership. So it cannot be that this appeal presents the abstract, purely legal issue whether agency principles *ever* may be used to impute a partner's knowledge and intent to a partnership for purposes of applying the crime-fraud exception.

Instead, C&S seeks in effect to have us review whether, given the nature of Collingsworth's relationship with the firm, the record supported the district court's

application of agency principles to impute his intent and actions to C&S. This question is not purely one of law about whether agency principles can be imputed for the purpose of applying the crime-fraud exception.

To the contrary, the question posed here requires a fact-specific inquiry into whether the evidence in this case—which showed, at a minimum, that Collingsworth was the C&S partner to whom Scherer, the managing partner, had delegated responsibility for the alien tort cases and who also served as the primary point of contact for the firm’s outside counsel in the defamation cases—is sufficient to support the application of agency principles in the crime-fraud context. To answer it would require the court to apply law to the particular facts of the case and thus to take a deep dive into this case’s voluminous record. The purpose of § 1292(b) is not to provide interlocutory appellate review of such fact-driven issues. *See McFarlin*, 381 F.3d at 1262. Accordingly, we conclude that permission to appeal on this issue was improvidently granted, and we decline to exercise our discretion to hear an interlocutory appeal related to the first question.

#### IV. LEGAL ANALYSIS

We now turn to the second question raised in this appeal, which we do exercise our discretion to answer. To clarify the question, we rephrase it slightly as follows:



Can the crime-fraud exception be applied to overcome attorney work product protection when the attorney or law firm was engaged in the crime or fraud but the client was not?

With this question, C&S in effect seeks to bar the disclosure of work product materials created in the alien tort actions, claiming that because its clients in those cases were innocent of any wrongdoing, work product protection is maintained despite the firm's participation in the wrongdoing.<sup>8</sup>

We hold that the district court properly concluded that the crime-fraud exception may be applied because illegal or fraudulent conduct by an attorney alone may suffice to overcome attorney work product protection.<sup>9</sup> We have previously recognized that in cases of attorney misconduct there is no protection for the attorney's work product. *See Parrott v. Wilson*, 707 F.2d 1262, 1271 (11th Cir. 1983). In *Parrott*, a party claimed that his attorney's secret recordings of conversations with two witnesses were protected from discovery as work product. *Id.* at 1270-71. We disagreed, concluding that because the attorney's clandestine recordings were unethical,<sup>10</sup> regardless of whether they were work product, they

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<sup>8</sup> Again, this issue relates only to materials from the alien tort cases, not the defamation case.

<sup>9</sup> We review *de novo* a question certified for interlocutory review under § 1292(b). *Johnson v. City of Fort Lauderdale*, 148 F.3d 1228, 1229 n.3 (11th Cir. 1998).

<sup>10</sup> At the time we decided *Parrott*, an ABA opinion concluded that it was unethical for an attorney to make a clandestine recording, even when such recording was legal under state law. 707 F.2d at 1271 n.19 (11th Cir. 1983). That ABA opinion has since been withdrawn. *See* ABA Comm. on Ethics and Prof'l Responsibility, Formal Op. 01-422 (2001). We express no opinion whether an attorney who makes a clandestine recording today acts unethically.

were not protected. We relied on a D.C. Circuit decision recognizing that “in some circumstances, a lawyer’s unprofessional conduct may vitiate” the protection afforded to attorney work product. *Id.* (quoting *Moody v. I.R.S.*, 654 F.2d 795, 799-801 (D.C. Cir. 1981)). The D.C. Circuit explained in *Moody* that “[a]n attorney should not be able to exploit [work product protection] for ends outside of and antithetical to the adversary system any more than a client who attempts to use the privilege to advance criminal or fraudulent ends.” *Moody*, 654 F.2d at 800. Based on this rationale, an attorney may not exploit work product protection when she engages in illegal conduct or a fraud upon the court even if her client is innocent.<sup>11</sup> Of course, for the crime-fraud exception to apply, a court must find that the specific document or testimony that the court is ordering to be produced reflects work of the attorney that was performed in furtherance of the criminal or fraudulent activity or that was closely related to it.

To support its contrary position, C&S cites several cases holding that an innocent client’s privilege cannot be overcome by the crime-fraud exception. But most of these cases consider the scope of the attorney-client privilege rather than

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<sup>11</sup> Our conclusion today is consistent with the holdings of other circuits that the crime-fraud exception may vitiate the protection afforded attorney work product in cases where an attorney commits a crime or fraud. *See In re Impounded Case (Law Firm)*, 879 F.2d 1211, 1213-14 (3d Cir. 1989) (allowing crime-fraud exception to overcome work product protection for “materials relating solely to possible criminal activity of [a] law firm”); *In re Doe*, 662 F.2d 1073, 1079 (4th Cir. 1981) (concluding that fraud exception allowed disclosure of work product when the lawyer, not client, was alleged to have engaged in the fraud).

the relationship between the crime-fraud exception and the attorney work product doctrine. *Moody*, the case on which we relied in *Parrott*, warrants further discussion, however.

In *Moody*, the D.C. Circuit recognized that the work product doctrine “create[d] a legally protectable interest in non-disclosure in two parties: lawyer and client.” 654 F.2d at 801. The D.C. Circuit explained that “the conclusion that an attorney has no right to object to the disclosure of work product made possible by his misconduct does not necessarily mean that the work product privilege is inapplicable to such documents” because “the client’s interest in preventing disclosures about his case may survive the misfortune of his representation by an unscrupulous attorney.” *Id.* C&S relies on this reasoning to argue that the crime-fraud exception may not be used to pierce work product protection when the underlying client is innocent because the innocent client may still invoke the doctrine.

We disagree with C&S’s position. *Moody* went on to explain that to determine whether an innocent client may rely on the work product doctrine to shield materials after his attorney engaged in a crime or a fraud, “[a] court must look to all the circumstances of the case . . . to decide whether the policy favoring disclosure outweighs the client’s legitimate interest in secrecy” and prevent disclosure when it “would traumatize the adversary process more than the

underlying legal misbehavior.” *Id.* Rather than adopting a blanket rule that the crime-fraud exception does not apply when there is an innocent client, the D.C. Circuit adopted a balancing test to weigh the client’s interest in secrecy against the reasons for disclosure. Because we agree with the D.C. Circuit’s application of this balancing test, the crime-fraud exception may apply to work product when the attorney but not her client is accused of misconduct.<sup>12</sup> We therefore reject C&S’s argument that the client’s innocence is an absolute bar to piercing attorney work product protection through the crime-fraud exception.<sup>13</sup>

We resolve the pure legal issue presented in this interlocutory appeal by holding that the crime-fraud exception may be applied to eliminate work product

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<sup>12</sup> To support its position that the crime-fraud exception cannot apply to overcome work product protection when a client is innocent, C&S also points to several decisions holding that an innocent attorney may invoke work product protection even if his client committed a crime or fraud using his services. *See, e.g., In re Grand Jury Proceedings #5 Empanelled Jan. 28, 2004*, 401 F.3d 247, 252 (4th Cir. 2005) (“[T]hose seeking to overcome the opinion work product privilege [using the crime-fraud exception] must make a prima facie showing that the attorney in question was aware of or a knowing participant in the criminal conduct.” (internal quotation marks omitted)). According to C&S, because an innocent attorney may continue to rely on the attorney work product doctrine when his client engaged in a crime or fraud, the converse must also be true: an innocent client may invoke work product protection even if her attorney committed a crime or fraud while providing services. We disagree. C&S’s position would, in effect, give an innocent client a right to veto any application of the crime-fraud exception to his attorney’s work product. We cannot agree that a client’s interest in preventing disclosures about his case means that the crime-fraud exception may never apply when the attorney, not the client, engaged in misconduct. Instead, a court must consider the totality of the circumstances to determine whether the policies favoring disclosure of such materials outweigh the client’s legitimate interest in secrecy in a particular case.

<sup>13</sup> To the extent that C&S disagrees with the district court’s application of the crime-fraud exception under the facts of this case, it would be quibbling with the way that the district court balanced the clients’ interests in secrecy against the need for disclosure in these particular circumstances, which would not raise a pure issue of law appropriate for review under § 1292(b).

protection based on attorney misconduct when the client is innocent. Accordingly, we affirm the district court's order.<sup>14</sup>

## V. CONCLUSION

Regarding the first question certified on appeal, we decline to exercise our discretion to answer whether agency principles may be used to apply the crime-fraud exception under the facts of this case. We will not answer this question because it does not present a purely legal question. This Court's earlier order granting permission to appeal is vacated as improvidently granted as to that question, and permission to appeal on that question is denied.

Regarding the second question certified on appeal, we conclude that the crime-fraud exception may in appropriate cases be applied to overcome work product protection based on attorney misconduct, even if the attorney's client is innocent of any wrongdoing. Accordingly, we affirm the district court's order on the crime-fraud exception.

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<sup>14</sup> On remand, under the district court's order, the special master will perform an *in camera* review of certain categories of documents that C&S and Collingsworth contend are protected by the attorney client privilege or work product protection. To conclude that the crime-fraud exception applies to require disclosure of any specific document, the special master must find that the document either (1) reflects a communication used to further a crime or fraud or was closely related to it or (2) was created to further a crime or fraud or was closely related to it. *See Cox*, 17 F.3d at 1422; *In re Grand Jury Investigation*, 842 F.2d at 1227.

Question 1 is **DECLINED**, the earlier order granting permission to appeal is **VACATED**, and the petition for permission to review is **DENIED**.

Question 2 is **ANSWERED**.

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