

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

**MOTION TO STRIKE EPSTEIN'S UNTIMELY SUPPLEMENTAL EXHIBITS AND TO
STRIKE ALL EXHIBITS AND ANY REFERENCE TO DOCUMENTS CONTAINING
PRIVILEGED MATERIALS LISTED ON EDWARDS' PRIVILEGE LOG**

Counter-Plaintiff Edwards, through undersigned counsel, hereby files this Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log, and in support states as follows:

Summary

In a transparent attempt to either conduct trial by ambush or sufficiently muddy the waters to request yet another continuance, Epstein has sporadically disclosed new trial exhibits over the past month in direct violation of multiple orders of this Court concerning both the deadline to disclose exhibits and the prohibition against general, catch-all exhibit categories. On February 6, 2018, Edwards was required to file his General Objection to Untimely Composite Exhibits, attached hereto as Exhibit 'A,' in order to preserve his objections to this highly prejudicial conduct.

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

Finally, on February 28, 2016, undersigned counsel sent the following communication to Epstein's counsel:

Your recent efforts to add documents not specifically identified to earlier listed categories prompts me to remind you that Judge Hafele has required that documents be identified in a manner that enables the opposing party to know in advance exactly which documents are intended to be offered in evidence. We assume you have complied with that directive and are relying on that compliance.

On March 2, 2018, only two days later and on the eve of trial, Epstein disclosed for the first time 198 new trial exhibits consisting of at least forty-nine (49) **privileged** e-mails generated when Edwards was at Rothstein Rosenfeldt Adler ("RRA") and engaged in actively prosecuting both civil claims against Epstein and the still-pending CVRA challenge to Epstein's extraordinary sweetheart plea deal. These e-mails have been **listed on Edwards' privilege log since February 23, 2011**. Epstein filed Edwards' 2011 privilege log with this Court on April 11, 2012 and has **not** obtained an order either overruling these privilege assertions or compelling production of these documents. At this time, it is unknown exactly how Epstein obtained these privileged materials, although it is clear that he did so in secret and has waited until the last possible moment to reveal that he is improperly in possession of Edwards' privileged materials.

The late disclosure of these trial exhibits is in direct violation of the Court's July 20, 2017 Order, the Court's December 5, 2017 oral ruling (concerning trial exhibits not-yet-produced and prohibiting general, catch-all exhibits) and the Court's January 16, 2018 ruling. Furthermore, despite the e-mail correspondence being listed on Edwards' 2011 Privilege Log, it is now clear that Epstein surreptitiously obtained these privileged communications years ago and his counsel failed to comply with their ethical obligations once coming into possession of clearly privileged materials listed on Edwards' privilege log to immediately relinquish possession of those materials.

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

Undersigned counsel (as well as Paul Cassell, Esq., as counsel for L.M., E.W. and Jane Doe) has since notified Epstein's counsel, Scott Link and Kara Rockenbach, that they are in possession of privileged materials and has requested that counsel take all ethically appropriate steps to turn over this information. That repeated request has been repeatedly denied.

Edwards requests that the Court strike all late disclosed trial exhibits, including specifically but not limited to the privileged materials identified on Edwards' 2011 Privilege Log, which Epstein's counsel has acknowledged have been in the possession of Epstein lawyers for years, since at least 2011. Edwards further requests that the Court strike and preclude Epstein's counsel from making any reference to materials that are clearly attorney-client and work-product privileged and which have been listed on Edwards' privilege log for seven (7) years. In addition to the violation of multiple Court orders and the unethical possession of these materials, not a single e-mail has any relevance whatsoever because: (1) Epstein did not have possession of them prior to instituting this malicious lawsuit against Edwards and therefore could not have relied on them to support probable cause, (2) Epstein has never testified that he relied upon them to continue this malicious lawsuit against Edwards, and (3) the communications generated in the course of the prosecution of claims against Epstein relate to conduct subject to the absolute protection of the litigation privilege.

Finally, Edwards requests that the Court require Epstein's counsel to show cause why they should not be sanctioned for their attempt to conduct trial by ambush by using improperly obtained privileged materials and then unethically refusing to destroy or turn over all copies of the privileged materials once being put on notice of same. Any subsequent sanction should include at a minimum an award of all costs and fees incurred in dealing with these issues.

The Court Orders Violated by Epstein

1. On July 20, 2017, the Court entered its Order Specially Setting Trial, which set the case for trial beginning on December 5, 2017.

2. In its Order, the Court required that the Pre-Trial Stipulation include "each party's numbered list of trial exhibits with specific objections, if any, **to schedules attached to the stipulation.**" (emphasis added). The Court made clear that the parties would be "**strictly limited to exhibits . . . disclosed . . . on the schedules attached to the Pre-Trial Stipulation . . .** absent agreement specifically stated in the Pre-Trial Stipulation or order of the Court upon good cause shown." (emphasis added).

3. Thus, the Court's July 20, 2017 Order limited the parties to only those trial exhibits that were specifically identified and disclosed on the Pre-Trial Stipulation.

4. In October and November 2017, the parties began exchanging Exhibit Lists and producing proposed exhibits in connection with the Court's Order. Epstein's Exhibit List listed as Exhibit #13, "miscellaneous," the broadest catch-all provision possible:

All documents produced by any party or non-party in this matter.

5. At the December 5, 2017 hearing, the Court instructed that any identified exhibits not previously produced must be provided to opposing counsel by no later than December 19, 2017. See, e.g., 12/5/17 Tr. at 225:21-226:4. The Court also cautioned that general "catch-all" exhibit categories would not be permitted and that, instead, the specific documents covered by

such exhibits must be separately identified and produced. See, e.g., 12/5/17 Tr. at 223:11- 225:14.

The message to the parties was clear: trial by ambush would not be permitted.¹

6. On December 19, 2017, Epstein produced copies of certain listed exhibits pursuant to that directive.

7. Epstein's Exhibit #13 contained twenty-seven (27) RRA emails. None of these emails were listed on Edwards' April 12, 2012 Privilege Log.

8. On December 22, 2017, the parties filed the Pre-Trial Stipulation. Epstein's Exhibit List was attached to the Pre-Trial Stipulation."

9. Thus, pursuant to the Court's December 5, 2017 ruling and the December 19, 2017 exhibit exchange, Epstein's Exhibit #13 was comprised of the 27 emails that had been specifically identified and produced.

10. Moreover, pursuant to the Court's July 20, 2017 Order Specially Setting Trial, Epstein was "strictly limited" to those 27 specific documents absent a showing of good cause, which would necessarily require the filing of some motion seeking relief from the Court.

11. Epstein, as has been consistent over the past few months, chose to ignore these Court Orders and instead began piecemeal producing additional proposed exhibits throughout the month of February, which finally prompted undersigned counsel to send correspondence to Epstein's counsel objecting to these flagrant violations of the Court's rulings. See Ex. 'A'.

¹ The Court's oral ruling was memorialized on January 16, 2018, when the Court entered its Order on Epstein's Revised Omnibus Motion in Limine Section B (Edwards' Trial Exhibits). This Order required Edwards to produce all trial exhibits that had not already been produced by December 20, 2018 and to produce all specific exhibits to a general "catch-all" category by no later than January 5, 2018. Although the Order did not specifically require Epstein to do the same, the reason was straightforward: Epstein claimed that he already produced all specific trial exhibits on December 19, 2017.

12. Epstein's continued violation of the Court's Orders culminated on March 2, 2018, with the eve-of-trial production of 198 new emails under Exhibit #13, which include at least forty-nine (49) privileged emails that are listed on Edwards' 2012 Privilege Log. This improper, prejudicial, and unethical conduct should not be permitted by the Court.

Timeline of the Privileged Materials at Issue

13. In order to orient the Court regarding Edwards' 2011 Privilege Log², Edwards has compiled the following timeline concerning the privileged e-mail communications at issue. Because the privileged materials at issue are e-mail communications from RRA, Epstein originally sought these records in the Bankruptcy Court to be produced by the Trustee, appointed to oversee the RRA bankruptcy proceeding. Edwards has highlighted the key State Court docket entries for the Court's convenience:

Bankruptcy Court	April 17, 2010	Epstein propounded a broad subpoena to the Trustee for RRA as an interested party in the bankruptcy case of In re: Rothstein Rosenfeldt Adler, 09-34791-RBR, requesting tens of thousands of emails (the subpoena was directed to the bankruptcy trustee because the trustee was in possession of all RRA emails). Epstein filed a Motion to Compel that production from the trustee. DE 807.
Bankruptcy Court	July 19, 2010	LM (one of Epstein's victims) filed an objection and amended motion for protective order, DE 819, explaining that the emails requested were barred from disclosure based on privilege and relevance grounds.
Bankruptcy Court	August 13, 2010	Judge Rey in the bankruptcy action entered an order regarding production of the emails to a special master, Judge Carney, appointed to oversee the emails produced and to prepare a privilege log. DE 888.
Bankruptcy Court	September 20, 2010	After having received 27,590 emails, Special Master Carney moved for clarification of the Order and made suggestions that LM's attorneys, which included Edwards, were in a better position to create a privilege log.

² Copy attached hereto as Exhibit 'B'.

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

Bankruptcy Court	September 27, 2010	Edwards moved for protective order through counsel Jack Scarola, adopting LM's arguments for a protective order and invoking work-product privilege. DE 1022.
Bankruptcy Court	September 30, 2010	LM joined in that DE 1022 motion and requested further clarification. DE 1038.
Bankruptcy Court	October 13, 2010	Hearing on Motion to Clarify before Robert Carney.
Bankruptcy Court	October 15, 2010	The bankruptcy court entered an Order which clarified its earlier Order, DE 1068, requiring that the trustee provide the emails at issue to Farmer Jaffe Weissing Edwards Fistos Lehrman (Edwards's firm at the time which was representing LM) and requesting FJWEFL prepare the log. The order also provided a procedure for the special master to hold a hearing about assertions of privilege.
Bankruptcy Court	October 20, 2010	Bankruptcy court cancelled the hearing on the motion for protective order. DE 1077.
State Court	November 23, 2010	Epstein files his amended privilege log.
Bankruptcy Court	December 16, 2010	LM filed a motion requesting a stay of the Order directing the preparation of a privilege log until after the time when the State court ruled on the then pending Motion for Summary Judgment. DE 1236.
Bankruptcy Court	December 22, 2010	Bankruptcy court entered an order extending the time for production of the privilege log until January 31, 2011. DE 1260.
State Court	January 25, 2011	FJWEFL produced 8,408 pages of non-privileged documents to Epstein.
Bankruptcy Court	January 26, 2011	FJWEFL served a privilege log, and the sufficiency of that log was challenged by Epstein in the bankruptcy court. DE 1442.
State Court	February 8, 2011	Epstein filed a Motion to Compel/Motion to Determine if Privilege Claims are Waived for failure to provide a privilege log.
Bankruptcy Court	February 15, 2011	FJWEFL filed a privilege log in the Bankruptcy Court.
Bankruptcy Court	February 23, 2011	FJWEFL filed an updated privilege log <u>(the current privilege log) detailing the emails where privilege was being maintained.</u> In addition to filing the privilege log, FJWEFL produced to counsel for Epstein, 12,711 pages of documents divided into two separate categories respectively labeled "attorneys eyes only" and "Farmer Jaffe Irrelevant E-Mails." Two boxes of "attorneys eyes only" documents were produced containing 1,829 pages of documents in the first box and 3,198 pages of documents in the second box. Two

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

		additional boxes of "Farmer Jaffe Irrelevant E-Mails" were also produced containing 3,804 pages of documents in the first box and 3,880 pages of documents in the second box.
State Court	March 30, 2011	Judge Crow entered an order staying the subpoena to the trustee.
State Court	May 27, 2011	Order setting hearing on all motions relating to discovery and privilege issues for July 13, 2011.
State Court	July 12, 2011	Epstein's Motion for Leave to Use Attorneys Eyes Only Documents produced under confidentiality agreement.
State Court	July 14, 2011	Edwards protective order granted. Epstein request for all emails is overbroad and not necessarily calculated to lead to admissible evidence.
State Court	March 9, 2012	Epstein Motion to Compel and Amend Protective Order relating to the subpoena to the Bankruptcy Trustee.
State Court	April 10, 2012	Order requiring Edwards to produce any non-privileged documents as identified in paragraph 13 of Edwards's Motion to Compel and Amend Protective Order.
State Court	April 11, 2012	Epstein files Edwards February 23, 2011 Privilege Log from the Bankruptcy Court in this case. <i>This Privilege Log identifies many of the privileged materials that Epstein is now attempting to use at trial.</i>
State Court	April 11, 2012	Epstein Motion to Compel production of documents from Edwards and for Sanctions.
State Court	April 23, 2012	Fowler White Motion to Withdraw
State Court	May 2, 2012	Agreed Order on Fowler White Withdraw
State Court	May 7, 2012	Edwards produces 163 pages of additional responsive documents in compliance with April 10, 2012 Order
State Court	May 8, 2012	Crow Order Requiring Better Privilege Log
State Court	May 15, 2012	Edwards Motion for Clarification on Discovery Issues. <i>To clarify the scope of the May 8, 2012 Order.</i>
State Court	May 15, 2012	Epstein Motion to Compel Discovery Responses and for Sanctions
State Court	May 30, 2012	Epstein Amended Motion to Compel Discovery Responses and for Sanctions

State Court	June 19, 2012	Order Setting hearing on Motion for Clarification.
State Court	August 3, 2012	Hearing on Motion for Clarification on Discovery Issues.
State Court	August 14, 2012	Scarola letter to Judge Crow enclosing proposed Order on Motion for Clarification on Discovery Issues <i>Provided before Epstein's voluntarily dismissed his claims against Edwards</i>
State Court	August 16, 2012	Epstein voluntarily dismisses case against Edwards without prejudice.
State Court	August 17, 2012	Judge Crow grants Edwards' Motion for Clarification and vacates his May 8, 2012 Order requiring an amended privilege log.³ <i>Edwards' April 12, 2012 Privilege Log remained in full force and effect. Epstein never challenged the sufficiency of that privilege log or made any attempt to overrule Edwards' privilege assertions or compel production of these privilege materials.</i>

14. To summarize, Edwards was provided with a total of 27,590 emails to evaluate. On January 25, 2011, Edwards produced 8,408 pages of non-privileged emails to Epstein. On February 23, 2011, Edwards produced an additional 12,711 pages of emails, which included 5,027 pages of emails that were designated "Attorney's Eyes Only." Between the January 25 and February 23, 2011 productions, Edwards turned over 21,119 pages of emails to Epstein. Edwards properly listed the remaining 6,471 pages of emails on his privilege log filed on February 23, 2011 in the Bankruptcy Court. Pursuant to Epstein's July 12, 2011 Motion for Leave to Use Attorneys

³ Judge Crow's Order also required Edwards to "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 . . . [the response] shall identify, in a proper privilege log as referenced in the Court's May 7, 2012 Order, responsive documents withheld from production on the basis of any assertion of privilege." Paragraph 13 of Epstein's Motion to Compel concerned e-mails between RRA lawyers and either (1) the Federal Government; (2) Conchita Sarnoff; and (3) any news reporters. Because Epstein had already voluntarily dismissed his action against Edwards, Edwards did not produce any written response to Paragraph 13 or any e-mails between RRA and these third-parties. And Epstein made no effort to seek production of these e-mails (at least, not through legitimate means).

Eyes Only Documents Produced Under Confidentiality Agreement, the Attorney's Eyes-Only documents are governed by a confidentiality agreement.⁴

15. On April 11, 2012, Epstein filed Edwards' privilege log in this case. Pursuant to Judge Crow's August 17, 2012 Order vacating his prior Order requiring Edwards' to file a better privilege log, the February 23, 2011 Privilege Log filed in this case on April 11, 2012 remains in full force and effect.

16. As referenced in the chart above, in May 2012, Epstein argued that Edwards' privilege log was insufficiently descriptive resulting in his inability to question the various assertions of privilege. Based on this contention alone, it is clear that Epstein was not in possession of the documents listed on Edwards' privilege log. Therefore, Epstein could not possibly have relied on these privileged documents at any time before the filing or during the continuation of his lawsuit against Edwards, which was voluntarily dismissed only three months later on August 16, 2012.

17. After voluntarily dismissing his claims against Edwards, Epstein never sought to overrule any of these privilege assertions or to compel production of the privileged materials listed on the log. Epstein has obviously been on notice of the privileged nature of those documents, knew they had been withheld from production, and knew that it was unethical to retain the privileged documents regardless of how he had acquired them.

⁴ Epstein's attempt to "confirm" with David Vitale, Esq., who only recently appeared in this case, that no confidentiality agreement exists further demonstrates the trial by ambush strategy of Epstein's counsel. The attorney to discuss that issue with, and to specifically identify that it related to RRA emails, was Jack Scarola, Esq., who has been handling the case since its inception.

18. Yet Epstein now seeks to use at least forty-nine (49) clearly privileged emails listed on the February 23, 2011 Privilege Log and has refused repeated requests to identify how he came into possession of the privileged materials as well as repeated requests to turn over and to destroy the privilege materials, as his counsel is ethically required to do.

A Comparison of Edwards' Privilege Log and Epstein's March 2, 2018 Untimely Exhibits

19. Epstein and his counsel are knowingly in possession of at least forty-nine (49) privileged e-mails that are designated on Edwards' 2012 Privilege Log:

Number of Privileged Emails in Epstein's Possession (49 TOTAL)	Bates Numbers from Epstein's Untimely Supplemental Exhibit #13	Bates Number/Range on Edwards' February 23, 2011 Privilege Log
1	02645	02633-02646
1	00149	00149
1	01527	01527
1	04493	04491-04518
1	04494	04494
1	04495	04495
1	00014	00014
1	00090	00090
1	00133	00133
1	08006	08000-08011
1	00026	00026
1	01004	01003-01005
1	12289	12289

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

1	26481	26479-26481
1	26480	26479-26481
1	26356	26356
1	26570	26570
1	03731	03719-03736
3	06406-06408	06404-06408
1	01686	01686
3	11123-11125	11123-11136
1	11126	11126
1	25925	25925
1	25874	25874
1	11145	11143-11146
1	03191	03191-03196
5	04398-04402	04387-04402
5	04408-04412	04403-04416
1	267476	26741-26763
1	08042	08033-08070
1	26741	26741-26763
3	08059-08061	08033-08070
3	26756-26758	26741-26763
3	08036-08038	08033-08070
1	26762	26741-26763
1	01117	01112-01117

3	08121-08123	08118-08123
4	26749-26752	26741-26763
3	08128-08130	08124-08156
3	08118-08120	08118-08123
3	08131-08133	08124-08156
3	08124-08126	08124-08156
4	08135-08138	08124-08156
1	27494	27494
1	26760	26741-26763
1	25997	25997
1	25937	25937
2	26604-26605	26604-26605
3	07019-07021	07019-07024

Summary of Relief Sought by Edwards

20. Edwards respectfully requests entry of an Order for the following relief:

- a. (1) Striking all exhibits produced by Epstein after December 20, 2017 in violation of the Court's July 20, 2017 Order, December 5, 2017 Oral Ruling, and January 16, 2018 Order;
- b. (2) Striking all proposed Epstein exhibits that contain or reference privileged materials specifically listed on Edwards' 2011 Privilege Log;

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

- c. (3) Striking any and all pleadings, motions and portions of deposition transcripts, in which Epstein's counsel improperly utilized privileged materials to drive the nature of that discovery;
- d. (4) Precluding Epstein's counsel from making any mention or use of any struck exhibits or pleadings, including the privileged materials;
- e. (5) Ordering Epstein, and his counsel, to show cause as to how (and when) they came into possession of materials listed on Edwards' 2011 Privilege Log;
- f. (6) Awarding Edwards his attorneys' fees and costs from the date Epstein first came into possession of privileged materials, used them in defending his case, and failed to properly disclose his possession of these materials to Edwards and the Court; and
- g. (7) Any such further relief as the Court deems just and proper given the circumstances.

WHEREFORE, Counter-Plaintiff respectfully requests that the Court enter an Order granting this Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log as requested herein.

Edwards adv. Epstein

Case No. 502009CA040800XXXXMBAG

Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 5th day of March, 2018.



JACK SCAROLA

Florida Bar No.: 169440

DAVID P. VITALE JR.

Florida Bar No.: 115179

Attorney E-Mails: jsx@searcylaw.com; and
mmccann@searcylaw.com

Primary E-Mail: _scarolateam@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: 561-383-9451

Attorneys for Bradley J. Edwards

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Motion to Strike Epstein's Untimely Supplemental Exhibits and to Strike all Exhibits and Any
Reference to Documents Containing Privileged Materials Listed on Edwards' Privilege Log

COUNSEL LIST

Scott J. Link, Esq.
Link & Rockenbach, P.A.
Scott@linkrocklaw.com
Kara@linkrocklaw.com
1555 Palm Beach Lakes Boulevard
Suite 301
West Palm Beach, FL 33401
Phone: 561-727-3600
Fax: 561-727-3601
Attorneys for Jeffrey Epstein

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com; smahoney@agwpa.com
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue S, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Nichole J. Segal, Esquire
njs@FLAppellateLaw.com; kbt@FLAppellateLaw.com
Burlington & Rockenbach, P.A.
444 W Railroad Avenue, Suite 350
West Palm Beach, FL 33401
Phone: (561)-721-0400
Attorneys for Bradley J. Edwards

Bradley J. Edwards, Esquire
staff.efile@pathtojustice.com
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

GENERAL OBJECTIONS TO UNTIMELY COMPOSITE EXHIBITS

Counter-Plaintiff, Bradley J. Edwards, by and through undersigned counsel, hereby files this General Objections to Untimely Composite Exhibits, and as grounds therefor states as follows:

1. At the December 5, 2017 special-set hearing, the Court ordered Counter-Plaintiff to produce copies of any exhibits that had not previously been produced by no later than December 20, 2017. (12/5/17 Tr. 216, 219, 226, 228).

2. That ruling was memorialized in the Court's January 16, 2018 Order on Plaintiff/Counter-Defendant Jeffrey Epstein's Revised Omnibus Motion in Limine Section B (Edwards' Trial Exhibits), as follows:

On or before December 20, 2017, Edwards shall produce to Epstein all trial exhibits that have not been previously produced in the form to be introduced at trial . . .

3. Yet on February 2, 2018, undersigned counsel received letter correspondence from Epstein's counsel, which enclosed a flash drive "containing additional documents for [Epstein]'s

trial Exhibit Nos. 18, 35, 48, 323 and 324. We are still obtaining additional public records and will provide those to you upon our receipt.” The numbered exhibits are ‘catch-all’ as follows:

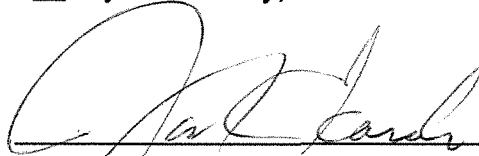
- a. #18 – Court docket and all court filings referenced therein for L.M. v Jeffrey Epstein, case no. 50-2008-CA-028051;
- b. #35 – Court docket and all court filings referenced therein for E.W. v. Jeffrey Epstein, case no. 50-2008-CA-028058;
- c. #48 – Court docket and all court filings reference therein for Jane Doe v. Jeffrey Epstein, case no. 08-cv-80893;
- d. #323 – All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party;
- e. #324 – All court dockets and filings in all matters against Jeffrey Epstein relating to any victim’s claims.

4. Edwards objects to all such late produced exhibits, whether contained in the February 2, 2018 flash drive or intended to be produced in the future, as violative of the Court’s December 5, 2017 ruling and January 16, 2018 order.

5. Additionally, the Court has previously ruled that, with regard to any “catch-all” exhibits listed on either party’s exhibit list, the party must separately identify and list individually each exhibit sought to be relied upon by the listing party.

6. Edwards therefore reserves all objections to all composite exhibits that fail to comply with this order by the Court.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve
to all Counsel on the attached list, this 6th day of February, 2018.



JACK SCAROLA
Florida Bar No.: 169440
DAVID P. VITALE JR.
Florida Bar No.: 115179
Attorney E-Mail(s): jsx@searcylaw.com and
mmccann@searcylaw.com
Primary E-Mail: ScarolaTeam@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for Plaintiff(s)

COUNSEL LIST

Bradley J. Edwards, Esquire
staff.efile@pathtojustice.com
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com; smahoney@agwpa.com
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue S, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Nichole J. Segal, Esquire
njs@FLAppellateLaw.com; kbt@FLAppellateLaw.com
Burlington & Rockenbach, P.A.
444 W Railroad Avenue, Suite 350
West Palm Beach, FL 33401
Phone: (561)-721-0400
Attorneys for Bradley J. Edwards

Scott J. Link, Esquire
Eservice@linkrocklaw.com; Scott@linkrocklaw.com; Kara@linkrocklaw.com;
Angela@linkrocklaw.com; Tanya@linkrocklaw.com; tina@linkrocklaw.com
Link & Rockenbach, P.A.
1555 Palm Beach Lakes Boulevard
Suite 301
West Palm Beach, FL 33401
Phone: (561)-727-3600
Fax: (561)-727-3601
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire
marc@nuriklaw.com
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301

Case No.: 502009CA040800XXXXMBAG
General Objection to Untimely Composite Exhibits
Page 5 of 5

Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein

NOT A CERTIFIED COPY

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

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

**PLAINTIFF JEFFREY EPSTEIN'S NOTICE OF FILING PRIVILEGE LOG OF
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN
DATED FEBRUARY 23, 2011 IN SUPPORT OF PLAINTIFF'S
MOTION TO COMPEL PRODUCTION OF DOCUMENTS FROM
DEFENDANT BRADLEY EDWARDS AND FOR SANCTIONS**

Plaintiff, Jeffrey Epstein, by and through his undersigned counsel and pursuant to the Florida Rules of Civil Procedure, hereby gives notice of filing the Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman Dated February 23, 2011 (attached hereto as Exhibit 1) in Support of Plaintiff's Motion to Compel Production of Documents From Defendant Bradley Edwards and for Sanctions.

Dated: April 10, 2012.

Respectfully submitted,

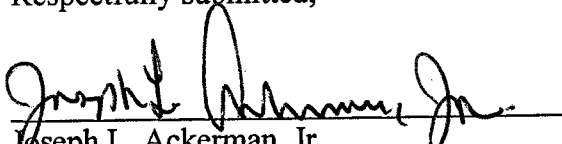

Joseph L. Ackerman, Jr.
Florida Bar No. 235954
FOWLER WHITE BURNETT, P.A.

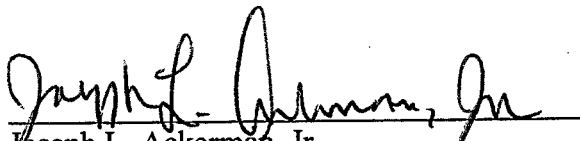
EXHIBIT "B"

FOWLER WHITE BURNETT, P.A.
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: (561) 802-9044
Facsimile: (561) 802-9976
Attorneys for Plaintiff Jeffrey Epstein
and

Christopher E. Knight
Florida Bar. No. 607363
FOWLER WHITE BURNETT, P.A.
Espirito Santo Plaza, 14th Floor
1395 Brickell Avenue
Miami, Florida 33131
Telephone: (305) 789-9200
Facsimile: (305) 789-9201
Attorneys for Plaintiff Jeffrey Epstein

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Federal Express on this 10th day of April, 2012 to: Lilly Ann Sanchez, Esq., The L•S Law Firm, Four Seasons Tower, 15th Floor, 1441 Brickell Avenue, Miami, FL 33131; Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; and Bradley J. Edwards, Esq., Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., 425 North Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301.


Joseph L. Ackerman, Jr.

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

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

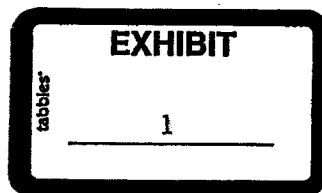
CHAPTER 11

Debtor.

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

Dated: February 23, 2011

Total of 159 pages



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	Jacque 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	Jacque Johnson	Trump Depo moved 08/18 to 9/24 in NY	Joint W/P Priv.
10194-10195	08/11/2009	Jacque Johnson	Kikka Claudio	FW: Out of state subpoenas	Joint W/P Priv.
10264-10266	08/09/2009	Adam Horowitz	Jacque 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	Jacque 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	Jacque Johnson	Depo	Joint W/P Priv.
10724-1073	10/14/2009	Adam Horowitz	Jacque 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	Jacquie Johnson	Kikka Claudio	RE: Ms. Maxwell Depo rescheduled	Joint W/P Priv.
15142-15158	08/11/2209	Bradley Edwards	Kikka Claudio	FW:out of state subpoenas	Joint W/P Priv.
15166-15170	08/11/2009	Jacquie Johnson	Kikka Claudio	RE:out of state subpoenas	Joint W/P Priv.
15171-15172	08/11/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15178-15182	08/12/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15306-15355	08/25/2009	Jacquie Johnson	Kikka Claudio	FW:Epstein Depo Notices & Subs	Joint W/P Priv.
14951-14952	08/03/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14954-14972	09/16/2009	Adam Horowitz	Jacquie 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	Jacquie Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14983-15015	08/04/2009	Jacquie Johnson	Adam Horowitz	RE:Epstein Depositions 8/14.17, &18 in NY & OH	Joint W/P Priv.
16501-16519	09/15/2009	Adam Horowitz	Jacquie Johnson	Epstein Hearing	Joint W/P Priv.
16520-16547	09/09/2009	Spencer Kuvin	Jacquie Johnson	RE:Epstein-Deposition of Jane Doe-9/30/2009	Joint W/P Priv.
16355-16384	08/24/2009	Adam Horowitz	Jacquie Johnson	Epstein Depo Notices and Subs	Joint W/P Priv.
16554-16568	09/16/2009	Kikka Claudio	Jacquie Johnson	RE:Epstein Depo	Joint W/P Priv.

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

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16874-16880	10/13/2009	Adam Horowitz	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 depos on 10/28	Joint W/P Priv.
17033-17034	10/26/2009	Kikka Claudio	Jacquie Johnson	RE:Epstein depos 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.

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02614-02617	08/05/2009	Bradley Edwards	Kikka Claudio	FW:Proposal Request	Joint W/P Priv.
15702-15704	10/02/2009	Bradley Edwards	Katherine Ezell	FW:Meeting w/St Stanley 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	Jacquie Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
15797-15798	10/14/2009	Spencer Kuvin	Bradley Edwards	RE:Epstein	Joint W/P Priv.
11560-11562	10/02/2009	Bradley Edwards	Katherine Jacquie Johnson	FW:Meeting w/St Stanley 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	Jacquie Johnson	RE:Epstein	Joint W/P Priv.
05832	09/08/2009	Adam Horowitz	Jacquie Johnson	RE:Epstein	Joint W/P Priv.
05838	09/08/2009	Jacquie Johnson	Jack Hill	RE:Epstein	Joint W/P Priv.
05847	09/09/2009	Jacquie 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.

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

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 Kuvn	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 Kuvn	RE:Epstein	Joint W/P Priv.
05936	09/18/2009	Bradley Edwards	Spencer Kuvn	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 Kuvn	RE:Epstein	Joint W/P Priv.
05951	05/29/2009	Bradley Edwards	Spencer Kuvn	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	Jacque Johnson	Margaret Berk	RE:Epstein	Joint W/P Priv.
05982-05983	10/28/2009	Bradley Edwards	Spencer Kuvn	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.

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

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 Josefborg	RE:Epstein	Joint W/P Priv.

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

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	Jacquie Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
04724-04725	05/27/2009	Bradley Edwards	Katherine Ezell	RE:Epstein Cases-depositions in federal cases	Joint W/P Priv.
BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
06990-07002	06/11/2009	Brad Edwards	Katherine W. Ezell	June 10 th hearing-WPB-Confidential	Joint-privilege
07003-07006	06/26/2009	Amy Ederi	Brad Edwards	June 25 th hearing-WPB-	Joint-privilege

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

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

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

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	Jacquie Johnson	Sarah Kellen	Joint-privilege
07965-07966	08/12/2009	Katherine W. Ezell	Bradley J. Edwards	Subpoena directed to the investigators	Joint-privilege
07977-07978	10/09/2009	Bradley J. Edwards	Spencer Kuvin	Subpoena Info	Joint-privilege
01716	09/15/2009	Adam Horowitz	Elizabeth Villar	Epstein: Forensics/Investigations INVOICE	Joint-privilege
01768	07/13/2009	Richard Willits	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01771-01772	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01931	08/11/2009	Bradley J.	Lisa Rivera	Alfredo Rodriguez	Joint-privilege

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

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02420-02421	05/08/2009	Bradley J. Edwards	Mercedes C. Estrada	Jane Doe II v. Epstein	Joint-privilege
02435	09/15/2009	Bradley J. Edwards	Lisa Rivera	Jane Does v. Epstein	Joint-privilege
02438	09/18/2009	Bradley J. Edwards	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 J. Edwards	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 J. Edwards	Kikka M. Claudio	Out of state subpoenas	Joint-privilege
02618	08/04/2009	Bradley J. Edwards	Kikka M. Claudio	Proposal Request	Joint-privilege
02627-02628	09/18/2009	Bradley J. Edwards	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 J. Edwards	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 J. Edwards	Adam Horowitz	Mark Epstein	Joint-privilege
03038	10/06/2009	Bradley J. Edwards	Stuart Mermelstein	Meeting with Leslie Wexner	Joint-privilege
03131-03132	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epsteins assets	Joint-privilege

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

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Ezell			
02978	10/29/2009	Bradley J. Edwards	Stuart Mermelstein	Leslie Wexner	Joint-privilege
02994	06/10/2009	Bradley J. Edwards	Mercedes C. Estrada	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 J. Edwards	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 J. Edwards	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 J. Edwards	Robert C. Josefsberg	Hearing to Un-seal	Joint-privilege
06702-06705	09/16/2009	Bradley J. Edwards	Kikka M. Claudio	Igor Zinoview & Tommy Matola depos	Joint-privilege
06706-06708	10/14/2009	Bradley J. Edwards	Kikka M. Claudio	Igor Zinoview depo	Joint-privilege
06715-06719	10/09/2009	Jack P. Hill	Bradley J. Edwards	Igor Zinoview depo	Joint-privilege
06729-06735	10/13/2009	Bradley J. Edwards	Jack P. Hill	Igor Zinoview depo	Joint-privilege
06763	08/19/2009	Bradley J. Edwards	Stuart Mermelstein	IME's	Joint-privilege
06764-06766	09/10/2009	Bradley J. Edwards	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

Privilege Log – Dated 2-23-2011
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	Jacque 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	Jacque Johnson	Maxwells deposition	Joint-privilege
16123-16124	08/11/2009	Kikka M. Claudio	Jacque Johnson	Maxwells deposition	Joint-privilege
16799-16801	10/02/2009	Robert C. Josefbergs	Jacque Johnson	Meeting with Stanley Arkin	Joint-privilege
02947-02948	08/03/2009	Spencer Kuvin	Jacque Johnson	Epstein Depo – New York	Joint-privilege
02891-20906	10/01/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
20880-20882	10/02/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
06042-06090	07/02/2009	William J. Berger	Spencer Kuvin	Ew 09-22784 cert.4 th dca	Joint-privilege
06402-06403	06/10/2009	Bradley J. Edwards	Katherine W. Ezell	Hearing to Un-seal	Joint-privilege
01365-01366	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint-privilege
01340-01341	07/30/2009	Adam Horowitz	Jacque Johnson	Epstein Depositions	Joint-privilege
01331	06/30/2009	Stuart	Bradley J. Edwards	Epstein depositions	Joint-privilege

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Mermelstein			
01319	08/11/2009	Adam Horowitz	Jacquie Johnson	Epstein Depo	Joint-privilege
01316	08/27/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Depo	Joint-privilege
01314	10/30/2009	Stuart Mermelstein	Jacquie 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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01188	05/12/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein – Confirming AT&T Dial in Telephone Conference for Tomorrow 5/13/09	Joint-privilege
01189	09/08/2009	Bradley J. Edwards	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 J. Edwards	Richard Willits	CMA vs. Epstein	Joint-privilege
01649	07/08/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01641	06/11/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01639	05/29/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01619	10/28/2009	Bradley J. Edwards	Spencer Kuvin	Epstein	Joint-privilege
01660	07/22/2009	Bradley J. Edwards	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 J. Edwards	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

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

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	Jacque Johnson	Adam Horowitz	Depo of Epstein	Joint W/P Privilege
04304	09/08/2009	Jacque 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	Jacque Johnson	Katherine Ezell	Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
04365	09/15/2009	Jacque 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	Jacque 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	Jacque 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	Jacque 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	Jacque Johnson	Adam Horowitz	Epstein Depo	Joint W/P Priv.
04806-04813	07/28/2009	Jacque Johnson	Adam Horowitz	Epstein Depos in New York	Joint W/P Priv.
04819	07/30/2009	Jack Scarola	Jacque Johnson	Epstein Depos	Joint W/P Priv.
04831-04832	07/30/2009	Spencer Kuvin	Jacquine Johnson	Epstein Depos	Joint W/P Priv.
04835-04836	07/25/2009	Katherine Ezell	Bradley Edwards	Epstein Depos	Joint W/P Priv.

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

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.

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

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 Kuvín	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 Kuvín	Epstein 5 th Amendment rights	Joint W/P Priv.
05229	07/10/2009	Bradley Edwards	Adam Horowitz	Motions to Compel	Joint W/P Priv.
05232-05233	07/10/2009	Bradley Edwards	Adam Horowitz	Motions fully briefed	Joint W/P Priv.
05247	07/23/2009	Katherine Ezell	Bradley Edwards	Answers to the 1 st set of ROGS	Joint W/P Priv.
05251-05252	07/24/2009	Katherine Ezell	Bradley Edwards	Depo dates	Joint W/P Priv.
05258	07/25/2009	Katherine Ezell	Bradley Edwards	Switzerland Witness regarding Epstein Egg Shaped 2 inch PENIS!	Joint W/P Priv.
05265-05266	07/22/2009	Adam Horowitz	Spencer Kuvín	Alfredo Rodriguez depo	Joint W/P Priv.

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

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	Jacque 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.

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

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

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

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 Kuvin	Motion for status conf.	Joint W/P Priv.
05770	07/08/2009	Bradley Edwards	Spencer Kuvin	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 Kuvin	Motion to appoint commissioner	Joint W/P Priv.
05788-05790	07/09/2009	Bradley Edwards	Spencer Kuvin	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 Kuvin	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

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

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

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

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	Jacquie 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

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

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

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

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

Privilege Log – Dated 2-23-2011
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

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

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 lead to the discovery of admissible evidence;protected by privacy rights

Privilege Log – Dated 2-23-2011
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	05/03/3009	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

Privilege Log – Dated 2-23-2011
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

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

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

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

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

Privilege Log – Dated 2-23-2011
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01118-01120	09/22/2009	Bradley Edwards	J. MG	Jane Doe v. Roe	Attorney/Client privilege and/or work product
01986-01989	04/02/2009	Bradley Edwards	J. Robin T. Kempner	Conflict check	Attorney/Client privilege and/or work product
01984-01985	04/02/2009	Bradley Edwards	J. 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	Jacquie Johnson	Confidential Source	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19716-19719	09/25/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
19730-19731	10/02/2009	Bradley Edwards	Confidential Source	Providing New Witnesses	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01683	08/06/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
01693	08/21/2009	Confidential Source	Bradley Edwards	Litigation Strategy	W/P Priv.; not reasonably calculated to lead to discovery of admissible evidence
03011	09/17/2009	Bradley Edwards	Confidential Source	Additional Information RE:	W/P Priv.; not reasonably calculated to lead to

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
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

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, Welssing, 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.

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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

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

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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					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	08/03/2009	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
04439-04442	09/16/2009	Bradley Edwards	Paul Cassell	RE: Epstein-Notice Of IME	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04445	07/31/2009	Jacque Johnson	Bradley Edwards	RE:Epstein Reminder-Mon 8/3/09-Monthly Call in Telephone Conference	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; protected by privacy rights
04425-04428	09/18/2009	Paul Cassell	Bradley Edwards	Jane Doe Depo Set for the 30 th	W/P; Attorney Client Privilege; Irrelevant and not reasonably calculated to lead to the

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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 Trial	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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					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	06/03/3009	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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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	Jacquie 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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

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

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

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
03020	09/16/2009	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
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	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
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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					discovery of admissible evidence; protected by privacy rights
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	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
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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
				Motion to Strike	to the discovery of the admissible evidence; protected by privacy rights
01925	08/26/2009	Jacque 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	Jacque 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;

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
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.	Jacque Johnson	Epstein - Cancelling depositions	Work product; attorney/client privilege;

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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;

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
01780	09/14/2009	Bradley J. Edwards	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 J. Edwards	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 J. Edwards	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 S. Williamson	Bradley J. Edwards	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 J. Edwards	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 J. Edwards	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 J. Edwards	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 J. Edwards	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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
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.	Jacquie 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;

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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	Jacque Johnson	Igor Zinoview depo	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead to the discovery of the admissible evidence;

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					protected by privacy rights
02376-02392	10/14/2009	Mike Fisten	Bradley Edwards	Igor Zinoviev 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	Jacque 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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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;

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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	Jacque 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	Jacque 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;

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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;

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
07967-07975	09/22/2009	Jacque 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	Jacque 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	Jacque 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	Jacque 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	Jacque 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;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					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	Jacque 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;

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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	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
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;

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
05502-05507	07/22/2009	Jacquie 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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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	Jacque 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	Jacque 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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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

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

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

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

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

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

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

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
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 depositions 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 depositions of all witnesses in the case	Work product; attorney/client privilege; irrelevant and not reasonably calculated to lead

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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					to the discovery of the admissible evidence; protected by privacy rights
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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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