

**From:** Robert Lewis [REDACTED]

**To:** [REDACTED]  
[REDACTED]

**Subject:** Epstein -- [REDACTED]

**Date:** Thu, 25 Jul 2019 18:11:08 +0000

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Dear [REDACTED],

I represent [REDACTED], a potential witness in your Epstein case. As you will recall, we spoke about Mr. [REDACTED] back in March, when you reached out to see if Mr. [REDACTED] would speak to you and we agreed that you could. Although you have not contacted Mr. [REDACTED], I thought you should know about some recent developments.

For the last week or so the New York Times (Mike McIntire) has been aggressively reaching out to Mr. [REDACTED], Jesse Rose (his employment lawyer) and me (who represented him in the Maxwell case) by email and phone, as well coming to Mr. [REDACTED] home twice. He is seeking our comments and information concerning the [REDACTED] and Mr. [REDACTED] testimony in the Maxwell case.

According to McIntire, the Times is planning to run story on the [REDACTED] and their ties to Epstein. It also appears that the Times has a copy of all or a portion of the deposition Mr. [REDACTED] gave in the Maxwell case, which is troubling because it was subject to confidentiality in that case and, although the Second Circuit has ordered the unsealing of the summary judgment papers (which likely include references to Mr. [REDACTED] deposition testimony), no mandate has issued or documents been unsealed.

In addition, the Times tells us that a "representative" of the [REDACTED] has told it that Mr. [REDACTED] "lied" in his deposition. If a representative did that, it is both defamatory and breaches a non-disparagement provision in the settlement agreement with Mr. [REDACTED]. The Times also informs that flight documents purportedly do not corroborate certain portions of Mr. [REDACTED] deposition. We do not have access to those flight documents, but we understand that Epstein's flight documentation is incomplete, if not materially inaccurate. Also pursuant to his settlement of his employment dispute with the [REDACTED] Mr. [REDACTED] destroyed all of the documents he possessed pertaining to the [REDACTED] which might corroborate some of his testimony,

We have rebuffed the Times' entreaties because of confidentiality obligations [REDACTED] has pursuant to a settlement agreement in the employment case and the confidentiality order in the Maxwell case, as well as his desire to avoid doing anything that would undermine your criminal prosecution.

Should you need or want a copy of Mr. [REDACTED] deposition transcript in the Maxwell case, we would provide it to you pursuant to subpoena.

If you wish to discuss these matters, please do not hesitate to call.

Best regards,

Bob Lewis



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