

From: "[REDACTED]" >

To: [REDACTED]
[REDACTED]

Subject: RE: Agenda

Date: Mon, 07 Dec 2020 16:40:11 +0000

Hi all—checking in on this, I've highlighted tasks that are completed or in motion. Let me know if I've missed anything. None of this is time-sensitive, I'm mostly just checking in to stay organized, so no rush on anything.

- Relativity review of GM emails:
 - o Team will split a batch review as a shared project, which will commence after we complete all Relativity review for discovery purposes.
- Identify an Interlochen employee (likely retired) who managed donor relations with Epstein/can authenticate documents
 - o Records custodian for student files can be dealt with closer to trial.
 - o [REDACTED] will contact counsel to begin discussing, and to follow up on our last conversation about records. (Within two weeks)
- Identify a PBPD detective who can authenticate items recovered from search of PB house
 - o [REDACTED] will handle outreach to PBPD (within one month)
- Talk to [REDACTED] to make sure [REDACTED] has searched all her emails for relevant communications
 - o [REDACTED] will handle and give a heads up they will contact her mother (within two weeks)
- Potentially interview [REDACTED] client
 - o [REDACTED] will review Relativity and set up interview (two weeks)
- Potentially re-interview [REDACTED]
 - o Team will review 302 and schedule follow-up interview
 - o [REDACTED] will contact [REDACTED] regarding an interview (within two weeks)
- Meet with [REDACTED]
 - o Discuss with chiefs tomorrow re: superseder timing
- Interview [REDACTED]
 - o Ask agents to contact and interview him ([REDACTED] – within 2 weeks)
- Re-interview [REDACTED] (with counsel)
 - o Ask agents to contact him re: appointed counsel ([REDACTED] –within two weeks)
- Interview [REDACTED]
 - o Talk to agents about an interview, not a high priority ([REDACTED])
- Interview Jo Jo Fontanella
 - o [REDACTED] will contact his attorney re in person interview
- Re-interview [REDACTED]
 - o [REDACTED] will contact his attorney re in person interview in January
 - o [REDACTED] will review emails in Relativity
- Interview [REDACTED] and [REDACTED] and other individuals on flights w/ [REDACTED]
 - o [REDACTED] will talk to agents about approaching them
- Review victim interview notes and interview any outcry witnesses we haven't spoken to yet, including [REDACTED]
[REDACTED] (within one month)
 - o [REDACTED]: [REDACTED]
 - o [REDACTED]: [REDACTED]
 - o [REDACTED]: [REDACTED]
- Interview [REDACTED] mother
 - o [REDACTED] will ask agents to interview by phone
- Investigate immigration records/travel records re: [REDACTED]

- o [REDACTED] will take a look and work with agents
- Interview [REDACTED] [REDACTED]
 - o [REDACTED] will call Sigrid about a potential interview
- Review deposition transcripts for GM (keeping in mind [REDACTED] is approaching)
 - o [REDACTED] will send [REDACTED] reminder
- Tip-line leads that [REDACTED] flagged
 - o [REDACTED] will flag for agents

From: [REDACTED]

Sent: Wednesday, November 11, 2020 4:25 PM

To: [REDACTED]

Subject: RE: Agenda

Here's the task list, based on our conversation:

- Relativity review of GM emails:
 - o Team will split a batch review as a shared project, which will commence after we complete all Relativity review for discovery purposes.
- Identify an Interlochen employee (likely retired) who managed donor relations with Epstein/can authenticate documents
 - o Records custodian for student files can be dealt with closer to trial.
 - o [REDACTED] will contact counsel to begin discussing, and to follow up on our last conversation about records. (Within two weeks)
- Identify a BBPD detective who can authenticate items recovered from search of PB house
 - o [REDACTED] will handle outreach to BBPD (within one month)
- Talk to [REDACTED] to make sure [REDACTED] has searched all her emails for relevant communications
 - o [REDACTED] will handle and give a heads up they will contact her mother (within two weeks)
- Potentially interview [REDACTED] [REDACTED] client
 - o [REDACTED] will review Relativity and set up interview (two weeks)
- Potentially re-interview [REDACTED] [REDACTED]
 - o Team will review 302 and schedule follow-up interview
 - o [REDACTED] will contact [REDACTED] regarding an interview (within two weeks)
- Meet with [REDACTED] [REDACTED]
 - o Discuss with chiefs tomorrow re: superseder timing
- Interview [REDACTED] [REDACTED]
 - o Ask agents to contact and interview him ([REDACTED] – within 2 weeks)
- Re-interview [REDACTED] [REDACTED] (with counsel)
 - o Ask agents to contact him re: appointed counsel ([REDACTED] –within two weeks)
- Interview [REDACTED] [REDACTED]
 - o Talk to agents about an interview, not a high priority ([REDACTED])
- Interview Jo Jo Fontanella
 - o [REDACTED] will contact his attorney re in person interview
- Re-interview [REDACTED] [REDACTED]
 - o [REDACTED] will contact his attorney re in person interview in January
 - o [REDACTED] will review emails in Relativity
- Interview [REDACTED] and [REDACTED] and other individuals on flights w/ [REDACTED]
 - o [REDACTED] will talk to agents about approaching them
- Review victim interview notes and interview any outcry witnesses we haven't spoken to yet, including [REDACTED] [REDACTED] (within one month)
 - o [REDACTED]: [REDACTED]
 - o [REDACTED]: [REDACTED]
 - o [REDACTED]: [REDACTED]
- Interview [REDACTED] mother
 - o [REDACTED] will ask agents to interview by phone

- Investigate immigration records/travel records re: [REDACTED]
 - o [REDACTED] will take a look and work with agents
- Interview [REDACTED] [REDACTED]
 - o [REDACTED] will call Sigrid about a potential interview
- Review deposition transcripts for GM (keeping in mind [REDACTED] is approaching)
 - o [REDACTED] will send [REDACTED] reminder
- Tip-line leads that [REDACTED] flagged
 - o [REDACTED] will flag for agents

From: [REDACTED] >

Sent: Friday, November 6, 2020 2:12 PM

To: [REDACTED] >; [REDACTED] >

Subject: RE: Agenda

Thanks very much, [REDACTED]! This all looks right to me and makes sense. If we are pushing this past Monday, I'd ask that it be Wednesday afternoon, or anytime Thursday, please. I've got a lengthy grand jury presentation to make on Tuesday.

From: [REDACTED] >

Sent: Friday, November 6, 2020 2:09 PM

To: [REDACTED] >; [REDACTED] >

Subject: Agenda

Team,

In preparation for our call (which we can reschedule to a time following the discovery deadline), I wanted to send around a list of topics to discuss for potential next steps. I'm sure I've missed some items, but this is a starting point at a least.

For context, I think we currently expect to call at least the following witnesses at trial:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- *Records custodian from Interlochen
- *Records custodian from the Professional Children's School
- *Court reporter(s) from GM depositions

*We haven't identified/spoken to these witnesses yet, so that's on the trial prep to-do list as well.

The following are some potential next steps – either individuals to interview or re-interview, records to search for/identify, and so forth.

- Relativity review of GM emails
- Identify an Interlochen employee (likely retired) who managed donor relations with Epstein/can authenticate documents
- Identify a PBPD detective who can authenticate items recovered from search of PB house
- Talk to [REDACTED] to make sure [REDACTED] has searched all her emails for relevant communications
- Potentially interview [REDACTED] [REDACTED] client
- Potentially re-interview [REDACTED] [REDACTED]
- Meet with [REDACTED] [REDACTED]
- Interview [REDACTED] [REDACTED]
- Interview [REDACTED] [REDACTED]
- Interview Jo Jo Fontanella
- Re-interview [REDACTED] [REDACTED]

- Interview [REDACTED] and [REDACTED]
- Review victim interview notes and interview any outcry witnesses we haven't spoken to yet, including [REDACTED]
- Interview [REDACTED] mother
- Investigate immigration records/travel records re: [REDACTED]
- Re-interview [REDACTED] [REDACTED] (with counsel)
- Interview [REDACTED] [REDACTED]
- Review deposition transcripts for GM (keeping in mind [REDACTED] is approaching)
- Tip-line leads that [REDACTED] flagged

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