

From: "[REDACTED] (USANYS)" <[REDACTED]>
To: [REDACTED] (USANYS)" <[REDACTED]>
Subject: RE: Revised MILs and letters
Date: Mon, 18 Oct 2021 20:36:02 +0000

OK will do.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, October 18, 2021 4:35 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Revised MILs and letters

Go ahead – I'm not in them. I didn't have comments. And agree with the below.

From: [REDACTED] (USANYS) <[REDACTED]>
Sent: Monday, October 18, 2021 4:34 PM
To: [REDACTED] (USANYS) <[REDACTED]>
Subject: RE: Revised MILs and letters

Here are a few comments on the motion. I looked at the two letters also, and have one suggestion on each (I'm happy to propose language in redline, but you may be in the docs)

1. On the "key" letter – would it be possible to include a sentence on [REDACTED] pointing to Judge Nathan to whatever the article(s) in which she has made comments about Epstein that are far more limited than what she will say in court?
2. On the sealing letter – I think we should add a sentence explaining why we think the claim of Maxwell abuse will cause prejudicial publicity. Namely, to air that issue in a public filing when there may well be no good faith basis for it would potentially taint the jury pool.

From: [REDACTED] <[REDACTED]>
Sent: Monday, October 18, 2021 3:46 PM
To: [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>
Subject: Revised MILs and letters

Hi [REDACTED] and [REDACTED]

Attached for your review are:

1. Revised MILs
2. A redline
3. A draft cover letter
4. A draft index letter with victim information

Thanks!

[REDACTED]

[REDACTED]
Assistant United States Attorney
Southern District of New York
[REDACTED]

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