

From: [REDACTED] >
To: Sigrid McCawley <[REDACTED]>
Subject: RE: Deposition Subpoena/Notice
Date: Mon, 13 Apr 2020 19:09:12 +0000

Thank you.

From: Sigrid McCawley [REDACTED]
Sent: Monday, April 13, 2020 15:06
To: [REDACTED]
Subject: FW: Deposition Subpoena/Notice

Sigrid McCawley
Partner

BOIES SCHILLER FLEXNER LLP

From: Daniel J. Kaiser [mailto:[REDACTED]]
Sent: Monday, April 13, 2020 2:35 PM
To: Sigrid McCawley [REDACTED]
Cc: Josh Schiller <[REDACTED]>; Sabina Mariella <[REDACTED]>; Andrew Villacastin
[REDACTED]
Subject: Re: Deposition Subpoena/Notice

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Her criminal lawyers have told me that until the criminal proceedings are done she is asserting her fifth amendment rights. So if you want substantive testimony you will have to wait. Out of curiosity have any of your clients been criminally pursued for their role in recruiting for Epstein? My client never did any recruiting which is far worst than anything she is accused of. And in any event, mid-May given the current crisis will not work.

Dan

Daniel J. Kaiser
Kaiser Saurborn & Mair, P.C.



On Apr 13, 2020, at 1:13 PM, Sigrid McCawley <[REDACTED]> wrote:

Hello Daniel,

Thank you for accepting service of the subpoena for [REDACTED]. We will consider any suggestion you have with respect to date and location of the deposition if you make them promptly, but we do not accept that you have the unilateral right to dictate anything about the deposition—your client has an obligation to appear unless the Court decides otherwise in response to a prompt motion by you.

Let me know if you have a different date in early to mid-May that you would like to propose.

Thanks,
Sigrid

Sigrid McCawley
Partner

BOIES SCHILLER FLEXNER LLP

From: Daniel J. Kaiser [mailto:[REDACTED]]
Sent: Friday, April 10, 2020 5:31 PM
To: Sigrid McCawley [REDACTED]
Cc: Josh Schiller [REDACTED]; Sabina Mariella [REDACTED]; Andrew Villacastin [REDACTED]
Subject: Re: Deposition Subpoena/Notice

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I will accept service subpoena. I take no position at this time regarding the assertion of her Fifth Amendment rights. The place and timing of any deposition must be coordinated with me and agreed to by me.

Dan

Daniel J. Kaiser
Kaiser Saurborn & Mair, P.C.

[REDACTED]

On Apr 10, 2020, at 5:03 PM, Sigrid McCawley <[REDACTED]> wrote:

Hello Daniel,

It is my understanding that you now represent [REDACTED] and are willing to accept service of a subpoena on her behalf. If I am incorrect, kindly let me know. It is also my understanding that she will no longer be asserting her 5th Amendment Privilege. Accordingly, I am attaching a subpoena for her deposition and a Schedule A for documents that we will need from Ms [REDACTED] in advance of her deposition.

Thank you,
Sigrid

Sigrid McCawley
Partner

BOIES SCHILLER FLEXNER LLP

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<2020-04-10 Depo Notice [REDACTED] May 7.pdf>

<2020-04-10 Subpoena & Schedule A to [REDACTED] Subpoena May 7.pdf>