

From: "[REDACTED]" >

To: "[REDACTED]" >

Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Date: Tue, 30 Jun 2020 20:25:32 +0000

No problem! Good luck with everything. I don't think there's any hard deadline on the request because we're not in court and they didn't send a subpoena. So the main constraint is Glassman's annoyance. I wrote him a brief note back last night, although I doubt that will keep him happy for very long. I try not to provide specific timelines on stuff like this, but if we need too much more time I can try letting him know a more specific sense of timing. Thanks!

From: [REDACTED] >

Sent: Tuesday, June 30, 2020 1:38 PM

To: [REDACTED] >

Subject: RE: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Hey I apologize for the delay – our entire team has been absolutely swamped for the past two weeks; we indicted Ghislaine Maxwell yesterday and now are working on arrest plans, and it's been insane. I very much hope to be able to take care of this next week, it's just been one thing after another for a little while.

From: [REDACTED] >

Sent: Sunday, June 28, 2020 23:06

To: [REDACTED] >

Subject: Fwd: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Hi [REDACTED],

Just checking in on this—do you think it will be possible to gather the materials this week? I will write Glassman back and tell him that I hope to follow up soon.

Thanks,

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: Robert Glassman <[REDACTED]>

Date: June 26, 2020 at 12:49:19 AM EDT

To: "[REDACTED], [REDACTED] (USANY)" <[REDACTED]>

Cc: "[REDACTED]", "Nathan Werksman"

<[REDACTED]>, Keilah Betts <[REDACTED]>

Subject: Re: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF

Mr. [REDACTED], I am following up on my client's request. It would mean a lot for your office to do what it can to see that her request is complied with in an expedient manner. Thank you.

Robert S. Glassman
Panish Shea & Boyle
psblaw.com

On Jun 8, 2020, at 4:19 PM, [REDACTED] (USANYS) <[REDACTED]> wrote:

Dear Mr. Glassman,

Thank you for your letter. I will follow up.

Thanks,
[REDACTED]

From: Robert Glassman <[REDACTED]>
Sent: Monday, June 8, 2020 3:08 PM
To: [REDACTED]
Cc: [REDACTED]; Nathan Werksman <[REDACTED]>; Keilah Betts <[REDACTED]>
Subject: Request for Tangible and Documentary Evidence (Touhy Request); Jane Doe v. Indyke et al., SDNY Case No. 1:20-cv-00484-JGK-DCF
Importance: High

Dear Mr. [REDACTED],

Please see the attached letter of today's date. A copy will also be sent via Fedex. Thank you.

Robert Glassman

Robert Glassman, Esq.
Panish Shea & Boyle LLP

[REDACTED]
Los Angeles, CA 90025

[REDACTED]
[REDACTED]
Email: [REDACTED]
Web: www.psblaw.com

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