

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "[REDACTED] (USANYS)" <[REDACTED]>  
**Subject:** RE: RE: plaintiff counsel request for documents, Epstein case  
**Date:** Tue, 31 Dec 2019 19:04:37 +0000

---

We haven't gotten a formal request yet because we haven't told them what form it needs to take. But I'll come by.

---

**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, December 31, 2019 14:04  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: RE: plaintiff counsel request for documents, Epstein case

Yes, and bring the request

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** Tuesday, December 31, 2019 2:03 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: RE: plaintiff counsel request for documents, Epstein case

I am indeed. Want me to swing by?

---

**From:** [REDACTED] (USANYS) <[REDACTED]>  
**Sent:** Tuesday, December 31, 2019 12:42  
**To:** [REDACTED] <[REDACTED]>  
**Subject:** RE: RE: plaintiff counsel request for documents, Epstein case

You in today?

---

**From:** [REDACTED] <[REDACTED]>  
**Sent:** Monday, December 30, 2019 3:49 PM  
**To:** [REDACTED] (USANYS) <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>; [REDACTED] (USANYS) <[REDACTED]>  
**Subject:** RE: plaintiff counsel request for documents, Epstein case

[REDACTED],

Following up on our brief discussion of this issue earlier this month, I wanted to see if you had any additional thoughts on how to handle requests from counsel for plaintiffs who are suing Epstein and his estate who ask us for information or materials in connection with our investigation – I think you had said we should instruct them to submit Touhy Requests, and that you would designate a Civil Division person to whom we could have them direct those requests. If that's right, could you please let us know who that person will be? So far we've just gotten the request from one plaintiff's counsel, Robbie Kaplan at Kaplan Hecker, and her request is very narrow but we want to set up the system in a way that will work if we get additional and/or more expansive requests going forward. And we would like to let her know how she should proceed relatively soon because that case has a status conference on January 10 and I think they'd like to make the request before then.

Please let us know if any other information would be helpful, and thanks as always.

[REDACTED]

[REDACTED]

Assistant U.S. Attorney  
Southern District of New York

[REDACTED]