

**From:** "[REDACTED]" <[REDACTED]>  
**To:** "Martin G. Weinberg" <[REDACTED]>, Reid Weingarten <[REDACTED]>  
**Cc:** "[REDACTED]" <[REDACTED]>, "[REDACTED]" <[REDACTED]>  
**Subject:** RE: US v Epstein  
**Date:** Fri, 26 Jul 2019 15:10:43 +0000

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Marty,

We have addressed this internally, following up on our general discussions on the subject, and what we need from the defense, please, is a formalized written request setting forth at least the following, in addition to any other information you think would be relevant for our consideration:

- Specifically with which what jurisdictions or parties you are requesting our (SDNY) communications be preserved or retained;
- Specifically which jurisdictions or parties you are requesting that we advise of your request that communications be preserved or retained; and
- Specifically what type of communications you are requested be preserved or maintained, in terms of the subject matter or content of the communications, for each relevant jurisdiction and/or party.

It would also be useful for you to delineate, for each topic and jurisdiction, the reasons you believe you would be entitled to those communications. It is not currently clear to us why the types of communications you have mentioned, irrespective of whether or not they exist, would be material to any potential defense motion. Separately, I do not expect we will be able to bind any district or party other than ourselves – but, again, once we have your full, formalized request, I expect we will be able to respond fully. In the interim, we want to again note that our understanding is that the Department of Justice has a robust retention policy for electronic communications in the normal course.

thank you,

[REDACTED]  
Assistant U.S. Attorney  
Southern District of New York  
[REDACTED]

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**From:** Martin G. Weinberg <[REDACTED]>  
**Sent:** Friday, July 26, 2019 08:25  
**To:** [REDACTED] <[REDACTED]>; Reid Weingarten <[REDACTED]>; [REDACTED] <[REDACTED]>; [REDACTED] <[REDACTED]>  
**Subject:** US v Epstein

[REDACTED], did you determine whether you would advise other relevant Party's (eg the ND Ga prosecutors assigned to the CVRA case) that the defense in the SDNY has made a preservation request for all communications with SDNY, Main Justice and with any plaintiffs lawyers or their clients that relate in anyway to Mr Epstein, thanks, Marty

Martin G. Weinberg, Esq.  
[REDACTED]  
[REDACTED] - Office

