

# **EXHIBIT 1**

## Gregory Poe

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**From:** Gregory Poe  
**Sent:** Tuesday, June 14, 2016 7:03 AM  
**To:** 'Brad Edwards'; Laura Menninger  
**Cc:** Sigrid McCawley; Martin G. Weinberg; Jeff Pagliuca; cassellp@law.utah.edu; Meredith Schultz  
**Subject:** RE: SERVICE - Epstein Deposition

Mr. Edwards and Ms. McCawley –

As I informed Ms. McCawley in my June 9, 2016 letter, I represent Jeffrey Epstein with respect to the Rule 45 subpoena. Marty Weinberg represents Mr. Epstein in *Does*.

Neither June 17 nor June 28 is an available date.

Regards,

Greg Poe

Please note: As of June 1, 2016, my email address has changed to [gpoe@gpoelaw.com](mailto:gpoe@gpoelaw.com). Please update your address book accordingly.

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**From:** Brad Edwards [mailto:brad@pathtojustice.com]  
**Sent:** Monday, June 13, 2016 7:42 PM  
**To:** Laura Menninger <lmenninger@hmflaw.com>  
**Cc:** Sigrid McCawley <Smccawley@BSFLLP.com>; Martin G. Weinberg <owlmgw@att.net>; Gregory Poe <gpoe@gpoelaw.com>; Jeff Pagliuca <jpagliuca@hmflaw.com>; cassellp@law.utah.edu; Meredith Schultz <mschultz@BSFLLP.com>  
**Subject:** Re: SERVICE - Epstein Deposition

Mr. Epstein's counsel is on this email chain so hopefully Mr. Weinberg will let us know which date works.

Sent from my iPhone

On Jun 13, 2016, at 7:36 PM, Laura Menninger <lmenninger@hmflaw.com> wrote:

Brad –

I do not know, nor have I ever represented to you, what Mr. Epstein's availability is for any deposition. He is not my client, and I do not have access to either his or his attorneys' calendars. I am speaking purely from the perspective of my and Jeff Pagliuca's availability to participate in any such deposition as counsel for Ms. Maxwell.

When I told you Ms. Maxwell's counsel's availability for depositions when we spoke on Friday, I made a point that we are NOT available on the 28<sup>th</sup> for an in person deposition and that we would only be able to participate by telephone that date. We disagree with being the only party to participate by telephone. I am now repeating to you what I said then regarding our availability to participate in person as counsel for Ms. Maxwell.

-Laura

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**From:** Brad Edwards [<mailto:brad@pathtojustice.com>]  
**Sent:** Monday, June 13, 2016 5:30 PM  
**To:** Laura Menninger  
**Cc:** Sigrid McCawley; Martin G. Weinberg; [gpoe@gpoelaw.com](mailto:gpoe@gpoelaw.com); Jeff Pagliuca; [cassellp@law.utah.edu](mailto:cassellp@law.utah.edu); Meredith Schultz  
**Subject:** Re: SERVICE - Epstein Deposition

Let me just jump in quickly. I can't tell by reading this email whether there is a disagreement about Mr. Epstein's deposition or not. I do understand that you don't think the adverse inference will be admitted in this case and we respectfully disagree. But that is an issue for another day.

On Friday, as you say in the beginning of your email below, we worked through a deposition schedule for the remainder of the month and agreed on Mr. Epstein for the 28th - as the last available day on our tight schedule for his depo. I relayed the schedule exactly as we had discussed. I also relayed that you said you would probably attend by phone (because Mr. Epstein will likely take the 5th anyway).

Are you saying now that Mr. Epstein is available this Friday, the 17th? If so, I will try to arrange my schedule to take it then. But to my knowledge we have not received that information from Mr. Epstein's attorney. If we can confirm that date now, then I will try to make that happen. If not, then we will take it on the 28th.

Brad

Sent from my iPhone

On Jun 13, 2016, at 6:21 PM, Laura Menninger  
<[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)> wrote:

Sigrid –

I had a conversation with Brad last Friday afternoon regarding the scheduling of depositions. During that conversation, I stated that the only day remaining in June that we could even potentially participate in a deposition of Mr. Epstein before the end of discovery cut-off would

be June 28<sup>th</sup>, however, I informed him we could only participate by phone on that date.

Just so you are clear, we object to the deposition being held at all, given Mr. Epstein's stated intention to take the 5<sup>th</sup> Amendment as to all questions, our strongly held and legally supported position that such a non-party 5<sup>th</sup> Amendment does not have any admissibility in this case, the cost and expense of such a deposition in the U.S. Virgin Islands and your failure to pursue in good faith a deposition of Mr. Epstein during the 5 ½ months of discovery available in this case. Furthermore, including the number of depositions that you have scheduled and cancelled at the last minute in this case, you have already reached the allowable 10 depositions before Mr. Epstein's.

If any deposition of Mr. Epstein is to occur by telephone, we believe all parties should participate by telephone. If it is to be in person, we are available on June 17 and June 21.

-Laura

**Laura A. Menninger**  
**Haddon, Morgan and Foreman, P.C.**  
**150 East 10th Avenue**  
**Denver, Colorado 80203**  
<image002.jpg> **Main 303.831.7364 FX 303.832.2628**  
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**[www.hmflaw.com](http://www.hmflaw.com)**

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**From:** Sigrid McCawley [<mailto:Smccawley@BSFLLP.com>]  
**Sent:** Sunday, June 12, 2016 9:57 AM  
**To:** Martin G. Weinberg; Laura Menninger;  
[gpoe@gpoe.com](mailto:gpoe@gpoe.com)  
**Cc:** Jeff Pagliuca; [brad@pathtojustice.com](mailto:brad@pathtojustice.com);  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu); Meredith Schultz; Sigrid McCawley  
**Subject:** RE: SERVICE - Epstein Deposition

Hello Marty and Mr. Poe,

Per the below - It is my understanding that Maxwell's counsel has confirmed with Mr. Edwards that they are available for the deposition of Mr. Epstein on Tuesday, June 28, 2016 at 9:00 a.m. in the USVI (with Maxwell's counsel participating by phone).

Per the below, we propose the island of St. Thomas as it is my understanding that this island is the closest island with an airport to Mr. Epstein's island. Kindly confirm the date and we will coordinate a location for the deposition.

Thank you,  
Sigrid

Sigrid S. McCawley  
Partner  
**BOIES, SCHILLER & FLEXNER LLP**

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Fort Lauderdale, FL 33301  
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**From:** Martin G. Weinberg [<mailto:owlmgw@att.net>]  
**Sent:** Friday, May 27, 2016 11:12 AM  
**To:** Laura Menninger; Sigrid McCawley  
**Cc:** Jeff Pagliuca; [brad@pathtojustice.com](mailto:brad@pathtojustice.com);  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu); Meredith Schultz; [owlmgw@att.net](mailto:owlmgw@att.net)  
**Subject:** Re: SERVICE - Epstein Deposition

Sigrid, with everyone in agreement as to both the service and the location issues, I would request that you notify Judge Sweet that the portion of your motion addressing the deposition service issue as to Mr. Epstein has been resolved. I will forward any proposals on dates to the attorney or attorneys who will physically be present at the deposition so that they, Laura, and you can work agree on a schedule and location. Thanks, Marty

**From:** Laura Menninger  
**Sent:** Friday, May 27, 2016 10:55 AM  
**To:** Martin G. Weinberg ; Sigrid McCawley  
**Cc:** Jeff Pagliuca ; [brad@pathtojustice.com](mailto:brad@pathtojustice.com) ;  
[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu) ; Meredith Schultz  
**Subject:** Re: SERVICE - Epstein Deposition

We do not oppose your agreement with respect to the location of Mr. Epstein's deposition.

-Laura

<image003.png> **Laura A. Menninger**  
**Haddon, Morgan and Foreman, P.C.**  
**150 East 10th Avenue**  
**Denver, Colorado 80203**  
**Main 303.831.7364 FX 303.832.2628**

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**From:** Martin Weinberg <[owlmgw@att.net](mailto:owlmgw@att.net)>  
**Date:** Thursday, May 26, 2016 at 4:13 PM  
**To:** Sigrid McCawley <[smccawley@bsfllp.com](mailto:smccawley@bsfllp.com)>  
**Cc:** Laura Menninger <[lmenninger@hmflaw.com](mailto:lmenninger@hmflaw.com)>, Jeff Pagliuca <[jpagliuca@hmflaw.com](mailto:jpagliuca@hmflaw.com)>, Brad Edwards <[brad@pathtojustice.com](mailto:brad@pathtojustice.com)>, Paul Cassell <[cassellp@law.utah.edu](mailto:cassellp@law.utah.edu)>, Meredith Schultz <[mschultz@BSFLLP.com](mailto:mschultz@BSFLLP.com)>, Martin Weinberg <[owlmgw@att.net](mailto:owlmgw@att.net)>  
**Subject:** Re: SERVICE - Epstein Deposition

Hi Sigrid. Mr. Epstein is in agreement to proceed with a VI deposition and to accept service for that deposition. I understand the issue expressed below and will promptly communicate with Ms Maxwell's counsel in order to determine her position.  
Thanks, Marty

**From:** [Sigrid McCawley](#)



**Sent:** Thursday, May 26, 2016 5:45 PM

**To:** Martin Weinberg

**Cc:** lmenninger@hmflaw.com ;  
mailto:jpagliuca@hmflaw.com ; brad@pathtojustice.com ;  
mailto:cassellp@law.utah.edu ; Meredith Schultz

**Subject:** RE: SERVICE - Epstein Deposition

Hello Marty,

Thank you for your response regarding our subpoena to Jeffrey Epstein. You have represented that Mr. Epstein will agree to accept service of the subpoena, "reserving his rights to contest the breadth of the subpoena and whether a deposition should be required at all given his articulated and principled intention to assert the Fifth Amendment in response to questions addressing the subject matter of the *Giuffre v. Maxwell* lawsuit" if we can accommodate his request to have the deposition take place near Mr. Epstein's Virgin Island residence.

We can agree on behalf of Ms. Guiffre to accommodate Mr. Epstein's location request, however, in an abundance of caution so that there is no misunderstanding, I have copied counsel for Ms. Maxwell for whom Mr. Epstein is in a joint defense agreement with, to confirm their agreement. If Ms. Maxwell's counsel does not agree to Mr. Epstein's deposition location request, then I will have to proceed with the Alternative Service Motion relating to Mr. Epstein that we have filed to have the Court confirm alternative service of Mr. Epstein in NY and the deposition in NY.

If you have not already done so, I ask that you please confer with your joint defense counsel and confirm with us that both Ms. Maxwell and Mr. Epstein are in agreement to proceed as you proposed with the deposition location in the Virgin Islands.

Thank you,  
Sigrid

Sigrid S. McCawley

Partner

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**From:** Martin Weinberg [<mailto:owlmgw@att.net>]

**Sent:** Thursday, May 26, 2016 12:11 PM

**To:** Sigrid McCawley; Martin Weinberg

**Subject:** SERVICE - Epstein Deposition

Sigrid, I am authorized to accept service conditioned on the deposition being located near Mr. Epstein's Virgin Island residence which you indicated in your email of May 25 was acceptable to you, on a date and location (close to but not at the residence) that would be agreeable to all parties, and on Mr. Epstein's reservation of all rights to contest the breadth of the subpoena and whether a deposition should be required at all given his articulated and principled intention to assert the Fifth Amendment in response to questions addressing the subject matter of the Giuffre v Maxwell lawsuit. Let me know if this resolves the service issue and if so a good time to discuss or exchange emails on dates and other specifics.

Marty

Martin G. Weinberg, Esq.

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=====This

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