

## **EXHIBIT 2**

**From:** Sigrid McCawley  
**Sent:** Thursday, April 07, 2016 12:01 PM  
**To:** Martin Weinberg  
**Subject:** RE: Giuffre v. Maxwell

No – I can wait until tomorrow. Thank you for following up.  
Sigrid

Sigrid S. McCawley  
Partner  
**BOIES, SCHILLER & FLEXNER LLP**  
401 East Las Olas Blvd., Suite 1200  
Fort Lauderdale, FL 33301  
Phone: 954-356-0011 ext. 4223  
Fax: 954-356-0022  
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**From:** Martin Weinberg [mailto:owlmgw@att.net]  
**Sent:** Thursday, April 07, 2016 11:42 AM  
**To:** Sigrid McCawley  
**Cc:** Martin Weinberg  
**Subject:** Re: Giuffre v. Maxwell

Sigrid  
Do you need an answer today?  
I have several time sensitive conflicts and then afternoon court commitments

Sent from my iPhone

On Apr 6, 2016, at 11:46 AM, Sigrid McCawley <[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

That works fine – thank you.

Sigrid S. McCawley

Partner

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

**Sent:** Wednesday, April 06, 2016 11:46 AM

**To:** Sigrid McCawley; Martin Weinberg

**Subject:** Re: Giuffre v. Maxwell

Sigrid, understood. Subject to reserving my rights to make any, all objections, I will let you know on facilitating service and discussing time and place no later than midday tomorrow (in court most of today). Let me know if that works. Marty

Martin G. Weinberg, Esq.

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On Wednesday, April 6, 2016 11:39 AM, Sigrid McCawley  
<[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

Hello Marty – Per your inquiry below - we are going to need to take a videotaped deposition of Epstein for use at trial. Kindly let me know if you are authorized to accept service on his behalf. We will be glad to coordinate a location and reasonable date that works for you and your client.

Thank you,  
Sigrid

Sigrid S. McCawley  
Partner  
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**From:** Sigrid McCawley  
**Sent:** Tuesday, March 08, 2016 1:13 PM  
**To:** 'Martin Weinberg'  
**Subject:** RE: Giuffre v. Maxwell

Hello Marty – thank you for your call back this afternoon. I understand from our conversation that you have a “preliminary question” before you can answer whether or not you are authorized to accept service of a subpoena for Jeffrey Epstein’s testimony in the Maxwell action.

You explained that it would be Epstein’s position that he would be invoking his Fifth Amendment privilege as to all questions relating to the Maxwell action so your “preliminary question” as I understand it, is whether the plaintiff would be willing to accept a form of sworn statement in response to questions whereby Epstein invokes his Fifth Amendment privilege in lieu of Epstein having to sit for a formal in-person deposition.

I will endeavor to get you a response shortly. Thank you for your call.

Sigrid

Sigrid S. McCawley  
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**From:** Sigrid McCawley  
**Sent:** Monday, March 07, 2016 3:21 PM  
**To:** 'Martin Weinberg'  
**Subject:** RE: Giuffre v. Maxwell

That would be fine. Thank you.

Sigrid S. McCawley  
Partner  
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**From:** Martin Weinberg [<mailto:owimgw@att.net>]  
**Sent:** Monday, March 07, 2016 2:59 PM  
**To:** Sigrid McCawley  
**Cc:** Martin Weinberg  
**Subject:** Re: Giuffre v. Maxwell

Hi Sigrid

Give me a few days to check. I represent him on certain matters, not others but will get back to you no later than

thursday on the service issue. Let me know if that works for you  
Thanks  
Marty

Sent from my iPhone.

On Mar 7, 2016, at 2:22 PM, Sigrid McCawley  
<[Smccawley@BSFLLP.com](mailto:Smccawley@BSFLLP.com)> wrote:

Hello Marty,

I understand that you are one of the lawyer who represent Jeffrey Epstein. My firm is representing Virginia Giuffre in her defamation action against Ghislaine Maxwell pending in federal court in New York – case number 15-cv-07433-RWS. ( If I am incorrect in my understanding that you represent Jeffrey Epstein kindly let me know.)

We would like to take the deposition of Jeffrey Epstein and want to confirm whether you will be willing to accept service of a subpoena on his behalf. Kindly let me know and we can discuss a date for the deposition.

If you have any questions, I can be reached at (954) 356-0011. I have included a copy of the complaint for your review.

Thank you,  
Sigrid

Sigrid S. McCawley  
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<2015-09-21 [DE 1] Complaint.pdf>

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