

# Exhibit E

**DOCUMENTS RELATED TO DEFENSE MOTIONS**

1. All written and oral communications concerning the negotiations relating to the Non-Prosecution Agreement (“NPA”) signed by Jeffrey Epstein on September 24, 2007. Such communications include:
  - a. All communications between the government – including, but not limited to, attorneys and staff at the U.S. Attorney’s Office for the Southern District of Florida, the United States Attorney’s Office for Southern District of New York, the Department of Justice, state prosecutor’s offices, the FBI, and any other federal and state investigative agencies – and Mr. Epstein’s attorneys.
  - b. All communications between and among any government employees including, but not limited to, attorneys and staff at the U.S. Attorney’s Office for the Southern District of Florida, the United States Attorney’s Office for Southern District of New York, the Department of Justice, state prosecutor’s offices, the FBI, and any other federal and state investigative agencies.
  - c. Unredacted copies of all emails and other correspondence between the government and Mr. Epstein’s attorneys concerning the negotiation of the NPA, previously produced by the government on August 13, 2020. *See, e.g.,* SDNY\_GM\_00134069 *et seq.*
2. All written and oral communications and other documents concerning any meetings between the attorneys for the accusing witnesses—including, but not limited to, Bradley Edwards, David Boies, Sigrid McCawley, Peter Skinner, Stanley Pottinger, Paul Cassell, Spencer Kuvin, and Jack Scarola (the “Attorneys”)—and prosecutors and staff from the United States Attorney’s Office for the Southern District of New York (“SDNY”) concerning Jeffrey Epstein and/or Ghislaine Maxwell.
  - a. This request includes all communications and documents related to any meetings that took place in or about 2016 in which certain of the Attorneys met with SDNY prosecutors to ask SDNY to initiate a criminal investigation into Mr. Epstein and Ms. Maxwell. *See New York Daily News*, “Manhattan Federal Prosecutors Declined to Pursue Jeffrey Epstein and Ghislaine Maxwell Case in 2016: Sources” (Oct. 13, 2020), <https://www.nydailynews.com/new-york/ny-jeffrey-epstein-maxwell-case-20201013-jmzh17zdrzdgrbbs7yc6bfnszu-story.html> ; *see also* Bradley J. Edwards, *Relentless Pursuit: My Fight for the Victims of Jeffrey Epstein*, at 281.
  - b. This request also includes all communications and documents related to any meetings between any of the Attorneys and SDNY prosecutors and staff concerning or relating to Mr. Epstein and/or Ms. Maxwell that took place in or about 2018, when the government asserts that it began the SDNY investigation into this case (*see* Dkt. 63), or at any time thereafter.