

EXHIBIT 3

Sigrid McCawley

From: Martin G. Weinberg <owlmgw@att.net>
Sent: Thursday, May 26, 2016 6:13 PM
To: Sigrid McCawley
Cc: lmenninger@hmflaw.com; jpagliuca@hmflaw.com; brad@pathtojustice.com; cassellp@law.utah.edu; Meredith Schultz; 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

BOIES, SCHILLER & FLEXNER LLP

401 East Las Olas Blvd., Suite 1200

Fort Lauderdale, FL 33301

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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.
20 Park Plaza
Suite 1000
Boston, MA 02116
(617) 227-3700 - Office
(617) 901-3472 - Cell

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Sigrid McCawley

From: Sigrid McCawley
Sent: Wednesday, May 25, 2016 10:30 AM
To: 'owlmgw@att.net'; 'marty@martinweinberglaw.com'
Cc: Sigrid McCawley; 'owlmgw@att.net'; Meredith Schultz
Subject: Subject: Re: Service on Jeffrey Epstein
Attachments: Re: Giuffre v. Maxwell; Re: Giuffre v. Maxwell; Re: Giuffre v. Maxwell; Re: Giuffre v. Maxwell; Guiffre v Maxwell

Hello Marty,

Thank you for the response. I went back through my e-mail communications and I didn't see anything about an agreement by you to accept service of Jeffrey Epstein's deposition for a deposition in the Virgin Islands near his residence. I have attached the e-mails that I have from you above. I do not have an "April 11th" e-mail as referenced below.

That said, we can work to accommodate that location request for a deposition in the Virgin Islands. If Mr. Epstein can accommodate us on his island, assuming he can provide transportation as I understand it is remote, we would be willing to take the deposition at that location. Please confirm given the agreement on relocating the deposition to the Virgin Islands that you will agree to accept service of the subpoena for Jeffrey Epstein's deposition.

Thank you,
Sigrid

Sigrid S. McCawley

Partner

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

Sent: Wednesday, May 25, 2016 8:33 AM

To: Sigrid McCawley; owlmgw@att.net

Subject: Re: Service on Jeffrey Epstein

Sigrid, first to "correct the record" – I did not simply refuse to accept service in response to your April 6 email, instead, on April 11 I emailed you saying that if you agreed to the deposition being near Mr Epstein's Virgin Island residence, I could accept service subject to our agreeing on a date and my reserving legal objections to the deposition request. I received no answer to that email. As to Monday's email, I would first request that you inform me whether you are agreeable to a deposition in the Virgin Islands (the predicate for my April 11 email and Mr Epstein's sole residential and business venue as defined by Rule 45) in which case I will determine immediately whether I am still authorized to accept service (particularly given the new {to me} and expansive request for documents that like the anticipated testimony would be subject to a principled Fifth Amendment assertion). I remain of the view that Mr. Epstein (indisputably I would contend) has a Fifth Amendment right and intends to assert it in relation to any and all questions and document requests relevant to the subject matter of your case. Thanks. Marty

From: Sigrid McCawley
Sent: Monday, May 23, 2016 9:30 AM
To: marty@martinweinberglaw.com
Cc: Meredith Schultz
Subject: Service on Jeffrey Epstein

Hello Marty,

As you are aware we initially reached out to you back on March 7, 2016 to inquire as to whether you would accept service on your client, Jeffrey Epstein's behalf. You did not agree to accept service so we proceeded with numerous service attempts on Jeffrey Epstein. I am attaching above the latest subpoena that we have been attempting service of. Please confirm whether you will accept service of this subpoena on behalf of Jeffrey Epstein or whether we will be required to seek court intervention for alternative service. As I mentioned previously, if you accept service, we can work with you and your client on a the date and location of the deposition to make it convenient for the parties.

Thank you,
Sigrid

Sigrid S. McCawley
Partner

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