

WIGDOR.

Jeanne M. Christensen

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January 9, 2025

VIA ECF

The Honorable Jessica G. L. Clarke
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Courtroom 11B
New York, New York 10007

Re: *Doe v. Black*, Case No.: 23-cv-06418 (JGLC)

Dear Judge Clarke:

We represent Plaintiff Jane Doe (“Plaintiff”) in the above-captioned action. We write further to the joint letter submitted on November 26, 2024 (ECF 166) regarding Plaintiff’s deposition subpoenas to Brad Karp (“Karp”), Andrew Ehrlich, and Gregory Laufer of Paul, Weiss, Rifkind, Wharton & Garrison LLP (“Paul Weiss”), as well as to Debra Black, wife of Defendant Leon Black (“Black”). Documents produced late yesterday evening in response to a nonparty subpoena issued to Leslie Groff provide ample support for Plaintiff’s position that both Karp and Mrs. Black do in fact possess information regarding Black’s relationship with Jeffrey Epstein (“Epstein”), and are fact witnesses based on their own interactions with Epstein. As the attached sample emails demonstrate, Karp had appointments himself with Epstein at Epstein’s townhouse, (*See Ex. A*) and Epstein had appointments to attend events and meet also with Mrs. Black. *See Ex. B*. Despite representations in the Dechert Report filed with the SEC and coordinated by Paul Weiss that Black’s relationship with Epstein began deteriorating in 2016, the documents are a treasure trove showing the opposite which makes the depositions of the Paul Weiss lawyers all the more relevant.

Because the production received is approximately 6000 documents and was received less than 24-hours ago, we anticipate that between now and the upcoming conference on January 16, 2024, Plaintiff will be able to provide other documents from this production supporting the propriety of deposing these individuals.



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We thank the Court for its time and attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeanne Christensen". The signature is fluid and cursive.

Jeanne M. Christensen

cc: All counsel of record (*via* ECF)