

To: Jeffrey Epstein[jeevacation@gmail.com]
From: drsra
Sent: Wed 6/16/2010 1:46:28 PM
Subject: Depo Questions for Experts

After lunch with Bob & Mark, I sent them the attached. It is my outline for how to take the defense expert's depo. While Bob always says I am trying to be a lawyer and that he knows best, I have testified an expert witness over 1,000 times and know what traps I have fallen into, when I dodged a bullet, and what I did when I was prepared. Let's see if he follows the formula. I find that lawyers who use a preplanned strategy for depo's do not get off track so easily. I used to have a dog, Spot, who was half german pointer bird dog. He never ran away, but he went out of the yard to smell this, then walked over there to piss on that, then chased a squirrel up that tree over there, and two days later I'd get a call from someone 10 miles away who had Spot (or the pound). Lawyers are like Spot. They get distracted easily by sudden interest, abandon a fruitful line of inquiry, and never get back to it. Let's see if your Spot can take direction.

SRA