

To: Jeffrey Epstein[jeevacation@gmail.com]
From: Lesley Groff
Sent: Thur 8/4/2011 9:11:25 AM
Subject: Brad Edwards

Sent from my iPhone

Begin forwarded message:

From: Brad Edwards <[REDACTED]>
Date: August 3, 2011 10:16:26 PM EDT
To: 'Lesley Groff' <[REDACTED]>
Subject: RE: Jeffrey Epstein

Lesley,

Please pass this along to Mr. Epstein.

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Again, I agree that our previous discussions were productive. Or at least could have been.... You expressed that you wanted to resolve both cases – (1) my case and (2) the CVRA. You suggested a binding arbitration with a high/low component on my case, and we discussed me putting together a proposal for resolving the CVRA case after I spoke with my clients. I immediately attempted to put your ideas in motion, but you apparently rejected the idea for the high/low agreement that you proposed. So I stopped preparing the proposal on the CVRA case because it appeared I was wasting my time.

As for the “insertion of my attorney”, maybe I was not clear enough on the phone, so I will say this as plainly as I can so that there is no confusion. Discussions regarding my case cannot be linked to the resolution of the CVRA case for obvious ethical reasons. That is why I turned over the finalizing of the settlement on my case to Jack Scarola. To be absolutely sure the separate negotiations are not inappropriately intertwined, I have given Jack complete discretion to resolve the abuse of process claim on terms that I consider to be reasonable and based upon the discussions that you and I have already had.

If it is the uncertainty of the proposal regarding the CVRA case that caused you to delay these negotiations by refusing to accept the terms related to the resolution of my case, then I will try to clear that up. As you know, you are not a party to the CVRA case. That case is not about money; it never has been, it never will be. My clients have absolutely no desire to settle this case. They want to fight until the end to hopefully achieve some real justice, and we feel very strong in our position

in that case and believe that case will result in significant positive change for crime victims. For me to ever recommend to my clients that they dismiss the CVRA action, and for my clients to listen to such a recommendation, they would have to feel that they accomplished something extraordinary for crime victims. With that said, the general structure of any settlement on the CVRA case would be pretty straightforward and simple. It would only include the formation, participation in, and funding of a crime victims-type Foundation. There will be no payment provision to [REDACTED] or [REDACTED] or any of the other victims, and no payment of attorney's fees or anything like that; in fact, no payment to anyone other than the Foundation. This is more than fair under the circumstances and completely in-line with our discussions. However, until you or your attorney reach an agreement with Jack as to how we are going to proceed on my case, there is nothing to discuss on the CVRA case.

Sincerely,

Brad Edwards

From: Lesley Groff [mailto:[REDACTED]]
Sent: Tuesday, August 02, 2011 5:15 PM
To: Brad Edwards
Subject: Jeffrey Epstein

Please see Mr. Epstein's message below.

**CONFIDENTIAL - FOR PURPOSES OF SETTLEMENT
DISCUSSIONS ONLY**

Brad,

I am truly sorry that we were not able to sit down face to face to continue our discussions. This is especially so given the fact that I thought you and I had agreed that our discussions were at last productive, particularly as there were no other attorneys involved. Just by talking, you and I resolved both the [REDACTED] and [REDACTED] claims in less than thirty minutes. So, I have to admit that I am disappointed at your suggestion that I am somehow not acting in good faith. I was quite surprised to have received a take it or leave it demand from Jack Scarola instead of the proposal for a workable structure that we agreed. You and I have started a constructive dialogue that I hope will continue. In that regard, I believe you might want to consider the fact that you told me that your lost wages for billable hours were approximately \$250K. Additionally, you thought that pain and suffering and damage to your reputation could somehow get you to a million dollars in damages. You said that was without even considering punitive damages. At the same time,

however, you also suggested that you were unwilling to accept any confidentiality obligations because you had already received an offer for a movie/book deal for a million dollars or more. Moreover, you have already settled a number of cases with me this year and are continuing to pursue the [REDACTED] [REDACTED] 3771 case, so I am unclear how you can continue to assert that your ability to bring in new cases has been damaged or that your income earning potential has been severely impacted. As you, yourself, said to me, the publicity alone cuts both ways. All that being said, it appears that, with the insertion of your attorney, things have come to an unnecessary halt. I am awaiting what you suggested was a thoughtful idea on the [REDACTED] [REDACTED] 3771 case. If you would like to resume our dialogue in an attempt to resolve everything, please feel free to call my secretary or Darren Indyke. Brad, I am sincerely disappointed that we have come to this point so soon after we have been able to make some real progress, but I hope to hear from you so we can resume our talks.

Sincerely,

Jeffrey Epstein

Sent from my iPhone