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May 25, 2010

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Honorable Edward B. Davis
Akerman Senterfitt
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Miami, FL 33131-1715

Sent by email and
by U.S. Mail to Judge Davis only

Re: Jeffrey Epstein

Dear Judge Davis:

We are in receipt of Mr. Josefsberg's letter to you dated May 21, 2010. We confirm that Mr. Epstein settled each and every case brought by the attorney-representative selected by you.

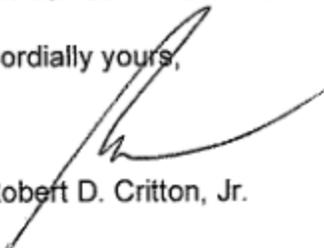
We write this response only to advise you that Mr. Epstein has never refused to pay reasonable settlement-related fees that are within the scope of the NPA. He has already paid the attorney-representative \$526,000. The attorney-representative has not yet presented him with a final invoice for settlement-related work. The incomplete invoices that have been presented seek \$2,000,000 in additional fees. Mr. Epstein has been advised by his attorneys that the requested fees include duplicative work, charges that relate to preparation for litigation not settlement (thus outside his NPA-fee obligations) and charges that are unreasonable and that should be reviewed by a Court rather than simply paid without meaningful review. A significant amount of the total fees (over \$1,000,000) is for legal work that the invoices document were done by two outside attorneys who are not even attorneys with the Podhurst Orseck, P.A. law firm. Mr. Epstein's disputes the necessity for and redundancy of these charges.

We respect Your Honor's selection and regret that the issue of disputed fees has resulted in litigation. Mr. Epstein is committed to paying whatever fees and costs are determined by the

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Court to be his obligation, if any, but he is not required to simply write a blank check. I have filed a motion in the case pursuant to F.R.Civ.P. 67, to allow him to deposit \$2,000,000 in Trust with the Court pending the outcome of the Complaint which confirms his commitment.

Cordially yours,


Robert D. Critton, Jr.

RDC/JPL:ab

Cc

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