

**PROPOSAL FOR PROCEEDING ONCE ATTORNEY
IS SELECTED**

1. Provide selected attorney with:
 - a. a copy of the relevant portion of the Non-Prosecution Agreement;
 - b. the names and contact information for the identified victims; and
 - c. a retainer agreement.
 - i. The retainer agreement will provide for the monthly billing of fees at an hourly rate and monthly expenses.
 - ii. The billing statements will be sent to and paid by an attorney or accountant not involved in the damages litigation, and will not be made available to any person or firm involved in the damages litigation.
 - iii. Billing statements will have privileged and work product information redacted.
 - iv. Disputes regarding fees will be referred to a Special Master (perhaps the Special Master who selected the attorney).
2. The agents and I will contact the girls individually to inform them of the resolution of the case, including the selection of an attorney to represent them, if they so choose. I will provide them with the name and telephone number of the attorney and also let them know that the attorney will be contacting them.
3. The selected attorney will contact each victim and review with her the facts of her case and the options that she has, namely:
 - a. selecting another attorney and handling everything through that attorney;
 - b. attempting to reach an agreement with Mr. Epstein for an amount of damages pursuant to 18 U.S.C. § 2255;
 - c. filing suit seeking other state and/or federal damages or restitution; and
 - d. not seeking any money damages from Mr. Epstein.

4. If the specific victim selects option (3)(b), the selected attorney will contact counsel for Mr. Epstein to negotiate a settlement amount and the terms of that settlement.
5. If the specific victim selects option (3)(b) and the parties are unable to reach an agreement regarding a settlement amount, then the victim can:
 - a. ask the selected attorney to file suit in the U.S. District Court for the Southern District of Florida, pursuant to 18 U.S.C. § 2255; or
 - b. file suit in state or federal court pursuing damages under any state or federal remedy.
6. If the specific victim selects option (5)(a), the representation of the victim by the selected attorney will continue using the same monthly billing and payment system contained in the retainer agreement.
7. If the specified victim selects option (5)(b), Mr. Epstein will have no further obligation to pay the attorney, except as ordered by the Court hearing the suit.