

**From:** Darren Indyke <[REDACTED]>  
**To:** Lesley Groff <[REDACTED]>  
**Subject:** Fwd: Privileged and Confidential  
**Date:** Mon, 18 Mar 2013 14:49:58 +0000

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Capdeville's address and contact info is in this email chain. Call his office and ask what to use for Fed Ex. Please. Thanks.

DARREN K. INDYKE  
DARREN K. INDYKE, PLLC  
575 Lexington Avenue, 4th Floor  
New York, New York 10022

[REDACTED]  
mobile: (602) 488-8818  
email: [REDACTED]

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Begin forwarded message:

**From:** "Douglas Capdeville" <[REDACTED]>  
**Date:** March 13, 2013 10:34:33 AM EDT  
**To:** "Darren Indyke" <[REDACTED]>  
**Subject:** RE: Privileged and Confidential

Ok. I will work on something today and get back to you.

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**From:** Darren Indyke [mailto:[REDACTED]]  
**Sent:** Wednesday, March 13, 2013 10:01 AM  
**To:** Douglas Capdeville  
**Subject:** Re: Privileged and Confidential

Would rather you tell me precisely what you need

Sent from my iPhone

On Mar 13, 2013, at 9:38 AM, "Douglas Capdeville" <[REDACTED]> wrote:

Perfect. Do you want to draft up something short and sweet?

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**From:** Darren Indyke [mailto:[REDACTED]]  
**Sent:** Wednesday, March 13, 2013 9:35 AM  
**To:** Douglas Capdeville  
**Subject:** Re: Privileged and Confidential

I am president of island grounds

Sent from my iPhone

On Mar 13, 2013, at 9:21 AM, "Douglas Capdeville" <[REDACTED]> wrote:

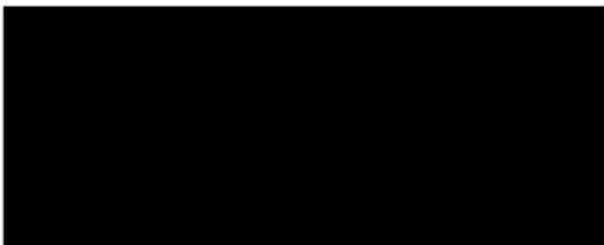
Sounds like a winner. Who will be the signatory?

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**From:** Darren Indyke [mailto:[REDACTED]]  
**Sent:** Tuesday, March 12, 2013 3:52 PM  
**To:** Douglas Capdeville  
**Subject:** Privileged and Confidential

There are no formal documents establishing any relationship between Island Grounds and LSJ, LLC. LSJ, LLC was at the relevant time, the owner of the Island. Island Grounds, Inc. employed workers to perform, among other things, construction work and services on Little St. James. Island Grounds, Inc. was owned at the time by IGO Company, LLC a USVI limited liability company whose sole member was Jeffrey Epstein. Jeffrey Epstein is also the sole member of L.S.J., LLC. Bellevue, who is Mark's employee, was aware of a relationship between LSJ and Island Grounds such that he chose to sue Island Grounds when he was performing work under Mark's contract with LSJ. Probably some affidavit stating as little as possible but enough to get you where you need to be in terms of standing.

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On Mar 12, 2013, at 3:16 PM, Douglas Capdeville wrote:

I always believed Mark was operating as a sole proprietorship even if though there is the word "Company" prefacing his name in the contract at issue. I will double check with the corporate records office on St. Thomas and confirm he is not a corporation. As to the second matter, he is trying to force us to reveal what the relationship is between the defendant/third party defendant, and L.S.J., other than simply a "representative". I do want to be careful that we don't leave ourselves open to dismissal for failure to allege sufficiently any matter. So, if you have any documentation establishing what the relationship is, we should have it on hand to fight the statement that Island Grounds has questionable standing to step into the shoes of L.S.J. Or perhaps an affidavit would suffice at this juncture in our opposition . Thanks.

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**From:** Darren Indyke [mailto: ]  
**Sent:** Tuesday, March 12, 2013 1:59 PM  
**To:** Douglas Capdeville  
**Subject:** Fwd: Bellevue v. Island Grounds, Inc.

I am not sure I understand his first point about he being a business and therefore can't be sued as an individual. Am I missing something? If he is operating a sole proprietorship without using an LLC or Corp, then why is he not individually liable? Secondly, does his second point that we have not attached anything to demonstrate that we are a representative make any sense? I am not sure what you want me to respond. Both points seem silly. What specifically do you want to know. Thanks.

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Begin forwarded message:

**From:** "Janelle Boodoosingh" <[REDACTED]>  
**Date:** March 6, 2013 4:11:24 PM EST  
**To:** "Darren Indyke" <[REDACTED]>  
**Cc:** "Douglas Capdeville" <[REDACTED]>  
**Subject:** Bellevue v. Island Grounds, Inc.

Enclosed please find the attached letter with enclosure regarding the above-referenced matter.

*Janelle Boodoosingh*  
Office Manager  
**Law Offices of Douglas L. Capdeville, P.C.**  
2107 Company Street, Lot 4  
P.O. Box 224191  
St. Croix, U.S. Virgin Islands 00822

