

DRAFT- F

May 17, 2010

Sent by E-Mail Only

Aaron Podhurst, Esq.
Podhurst Orseck, P.A.
25 West Flagler Street, Suite 800
Miami, FL 33130

Re: **Epstein Matter – Attorneys' Fees - NPA**

Dear Aaron:

On May 11, 2010, I received some of the additional attorney/fee cost information in response to my request dated April 29th. I did not receive current Amy or Susan fee/cost information.

In addition to the \$526,466.15 paid to date, Mr. Epstein is offering an additional \$1,000,000.00 in new money (for a total of \$1,526,466.15) to completely and finally fulfill Mr. Epstein's obligation under the NPA to pay the attorneys' fees and costs on all cases handled by your firm. While we still believe that the fees and costs are excessive and duplicative, Mr. Epstein is extending this offer and waiving his right to contest all legal and factual issues associated with fees/costs to finally resolve these issues.

Upon payment of this additional amount, your firm, Amy Ederi and Susan Bennett must provide general releases to Mr. Epstein. Payment will be made within ____ days of receiving your letter of acceptance.

Cordially yours,

Robert D. Critton, Jr.

RDC/ab

Cc: Steve Marks, Esq.
Jack Goldberger, Esq.
Roy Black, Esq.