

April 18, 2016

Little, Brown & Company
Market Place Center
3 Center Plaza
Boston, MA 02108

ATTENTION: LEGAL COUNSEL

**RE: Proposed book by James Patterson regarding
Jeffrey Epstein**

Dear Sir or Madam:

By letter dated December 3, 2015 Martin G Weinberg cautioned Little, Brown & Co about the legal risks to which it would be subject in publishing a proposed book about our client, Jeffrey Epstein, based on the defamatory media reports and the unreliable sources that have appeared over the past years. At the time, Mr. Weinberg understood that the author of that book was to be John Connolly. Little Brown & Company gave no response to that letter, but, as we now understand, proceeded on its ill-advised course. Mr. Weinberg received both by email and fedex a letter dated April 14, 2016, addressed to Mr. Epstein, and authored by James Patterson representing that a book about Mr. Epstein titled "Filthy Rich" was intended for publication this August.

So that there can be no doubt of your exposure to liability in such an undertaking, I want to once again put you on notice that Mr. Epstein has been the past subject of repeated and widespread untruthful, inaccurate, and defamatory media coverage. It would be in reckless disregard for the truth if a book relying in whole or in part on such media coverage were published or if a book relying on biased and provably untruthful or unreliable sources of

information became the basis for further prejudicial publicity about Mr. Epstein. Given that James Patterson is being named as author (or co-author), the proposed book is likely to generate a wider audience which would likely magnify a potential damage award, although large portions of the book may be predicated on Mr. Connolly's investigation and writing. We reserve any and all legal rights to contest the basis, and, should it prove necessary, to commence suit against all those who bear responsibility, for any inaccurate or untruthful publication by your firm.

Expecting that a firm of your caliber should strive to act in a professional and responsible manner, we would be prepared to review an advance copy of the manuscript for the book to aid you in further investigating any defamatory falsehoods that may be contained therein before continuing with its publication. Short of that, if you decide to proceed with a release of the book, which we strongly caution against, you would be doing so at your own considerable risk.

Very truly yours,

Reid H. Weingarten

cc: James Patterson