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January 7, 2010

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Sent by E-mail and U.S. Mail

Spencer T. Kuvin, Esq.
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Re: **B.B. v. Epstein**

Dear Spencer:

I am in receipt of your January 4, 2010 letter referencing the deposition of Jerry Goldsmith. To my knowledge, he has no personal knowledge regarding any relevant or material fact in this case. His only involvement was as related by former Palm Beach Chief Michael Reiter at his deposition.

If your client had any contact with Mr. Goldsmith through Mr. Epstein, then clearly, the deposition may have some relevance. However, if your sole purpose is to establish that Mr. Goldsmith contacted Chief Reiter on behalf of Mr. Epstein for whatever reason, it is an issue which is not relevant, or material, nor will any associated with it ever be admissible.

I would ask that you reconsider taking the deposition of Mr. Goldsmith in that it is a waste of time and money for everyone's respective clients, and it serves no meaningful purpose in the dispute between your client and mine.

Cordially yours,

Robert D. Critton, Jr.

RDC/clz

cc: Jack Goldberger, Esq.