

BC | BURMAN, CRITTON
LC | LUTTIER & COLEMAN, LLP
YOUR TRUSTED ADVOCATES

A LIMITED LIABILITY PARTNERSHIP

J. MICHAEL BURMAN, ^{1,2}
GREGORY W. COLEMAN,
ROBERT D. CRITTON, JR.,
BERNARD A. LEBEDEKER
MARK T. LUTTIER, P.A.
JEFFREY C. PEPIN
MICHAEL J. PIKE
HEATHER MCNAMARA RUDA
DAVID A. YAREMA

January 7, 2010

ADELOQUI J. BENAVENTE
PARALEGAL/INVESTIGATOR
JESSICA CADWELL
BOBBIE M. MCKENNA
ASHLIE STOKEN-BARING
BETTY STOKES
PARALEGALS
RITA H. BUDNYK
OF COUNSEL
EDWARD M. RICCI
SPECIAL CONSUMER
JUSTICE COUNSEL

¹ FLORIDA BOARD CERTIFIED CIVIL TRIAL LAWYER

² ADMITTED TO PRACTICE IN FLORIDA AND COLORADO

Sent by E-mail and U.S. Mail

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

Re: **Epstein Matter**

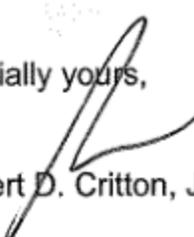
Dear Kathy:

I am in receipt of your January 5, 2010 letter regarding discovery related issues. It appears you know more than I do with regard to certain of the proposed deponents. I have yet to be contacted regarding dates for most of the witnesses who were referenced in your letter.

At the current time, you have no active, filed the cases. As such, you have no legal right to participate in any discovery.

As to your request that my client agree to your participation in ongoing discovery, we will not agree. It may never be necessary for any discovery to take place with regard to your remaining client.

Cordially yours,


Robert D. Critton, Jr.

cc: Jack Goldberger, Esq.