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Steptoe
STEPTOE & JOHNSON LLP

July 25, 2016

By E-Mail

Eric Rayman
Miller Korzenik Sommers Rayman LLP
[REDACTED]
New York, New York 10022
[REDACTED]

Re: Jeffrey Epstein

Dear Eric:

As you know, our firm represents Jeffrey Epstein. I write to respond to your letter dated May 5, 2016, claiming to be “disappointed” that Mr. Epstein will not agree to be interviewed for a book that your client, Hachette Book Group, intends to publish about him.

Your feigned “disappointment” cannot be taken seriously. No reasonable person in Mr. Epstein’s position would subject himself to questioning from authors whose bias and intent to smear him is already evident. John Connolly has a well-known track record of attacking Mr. Epstein, and the book is being marketed under a title — “Filthy Rich” — that makes the authors’ hostility to Mr. Epstein plain. The authors’ interview proposal is and always has been a sham intended to create the appearance of evenhandedness, when you well know that any interview would be, in reality, an ambush.

Mr. Epstein has no interest in “present[ing] his version of events” (as you state in your May 2 letter) to biased authors in an interview, and should not be required to do so as a condition of our more basic request that he be offered an opportunity to review the manuscript and point out where the authors’ version of events is simply false.

The need for such a review is clear because the media has a long history of getting the facts wrong when covering Mr. Epstein. Hachette Book Group and the authors thereby have every reason to doubt the reliability of those same media reports and their underlying sources. Hachette Book Group has particular reason to doubt the veracity of material from authors whose history and book title confirm that they are approaching their subject with a preconceived

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agenda. Mr. Epstein is uniquely situated to identify errors because he is the subject of the book, and your client's refusal to afford him that opportunity reflects a stunning disregard for the journalistic function of finding the truth.

I remind you that, under New York law, Hachette Book Group and the authors will be liable for acting "in a grossly irresponsible manner without due consideration for the standards of information gathering and dissemination ordinarily followed by responsible parties." *Chaiken v. VV Pub. Corp.*, 119 F.3d 1018, 1031 (2d Cir. 1997) (citation omitted). Evidence of gross irresponsibility can be shown by the factors I have already flagged above: (i) an author's prior hostility to his subject, *New Jersey Steel Corp. v. Lutin*, 297 A.D.2d 557, 558 (1st Dep't 2002), (ii) the "failure to investigate thoroughly and verify the facts," *Celle v. Filipino Reporter Enterprises Inc.*, 209 F.3d 163, 190 (2d Cir. 2000) (citation omitted), and (iii) the "failure to seek corroboration from the most obvious source" — in this case, Mr. Epstein himself. 1 Hon. Robert Sack, *Libel, Slander & Related Problems*, at 5-90 (4th ed. 2010).

We ask that Hachette Book Group reconsider its reckless course, but, should it plow blindly forward with publication, be assured that we will vigorously pursue all available legal remedies against it, and against the authors.

Sincerely,



Charles Michael

cc: Martin G. Weinberg
(by email, [REDACTED])

James Patterson
(by overnight mail)

John Connolly
(by overnight mail)