

IN THE CIRCUIT COURT OF THE  
15TH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY,  
FLORIDA

CASE NO:  
502008CA037319XXXMB AB

B.B.,  
Plaintiff,

vs.

JEFFREY EPSTEIN,  
Defendant.

PLAINTIFF'S NOTICE OF FILING PROPOSAL TO DEFENDANT  
JEFFREY EPSTEIN

Plaintiff, B.B., by and through her undersigned counsel, hereby gives Notice of Filing a Proposal for Settlement to Defendant, JEFFREY EPSTEIN.

HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this 23 day of March, 2010, to Jack A. Goldberger, Esq., [REDACTED]

[REDACTED]; Bruce E. Reinhart, Esq., [REDACTED]

[REDACTED]; Robert D. Critton, Jr., Michael J. Pike, [REDACTED]

[REDACTED]

LEOPOLD-KUVIN, P.A.

[REDACTED]

By: Spencer T. Kuvin, Esq.

[REDACTED]

IN THE CIRCUIT COURT OF THE  
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B.B.,

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Defendant.

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**PROPOSAL FOR SETTLEMENT FROM B.B.**

The Plaintiff, B.B., by and through her undersigned attorneys, serves the following Proposal for Settlement upon the Defendant, JEFFREY EPSTEIN, and states:

1. This proposal is made pursuant to Florida Rules of Civil Procedure, Rule 1.442, and applicable Florida Law, Florida Statute §768.79.
2. This proposal is served to Defendant JEFFREY EPSTEIN.
3. This proposal is being made for the purpose of resolving all pending claims in this action between the Plaintiff, B.B., and JEFFREY EPSTEIN resulting from an incident which occurred between B.B. and JEFFREY EPSTEIN.
4. The total amount of this Proposal for Settlement is THREE HUNDRED EIGHTY THOUSAND (\$380,000.00) Dollars.
5. This Proposal for Settlement includes any and all claims for punitive damages.
6. All parties shall bear their own costs and attorneys fees.



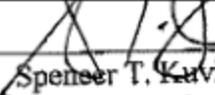
7. Plaintiff, B.B., agrees that if Defendant JEFFREY EPSTEIN accepts this proposal, upon acceptance of the terms of this proposal Plaintiff, B.B. will dismiss Defendant JEFFREY EPSTEIN with prejudice in the above captioned matter.

HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by U. S. Mail, postage prepaid, this 23 day of March, 2010 to Jack A. Goldberger, Esq., [redacted]; [redacted]; Bruce E. Reinhart, Esq., [redacted]; [redacted]; [redacted]; Robert D. Critton, Jr., Michael J. Pike, [redacted] Banyon Boulevard, Suite 400, [redacted].

LEOPOLD-KUVIN, P.A.



By:

  
Spencer T. Kuvin, Esq.  
Florida Bar No.: [redacted]