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A LIMITED LIABILITY PARTNERSHIP

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April 19, 2010

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Sent by E-Mail Only

Dennis S. Hersch
President, [REDACTED] Property, Inc.
c/o The Wexner Foundation
551 Madison Avenue, 9th Floor
New York, New York 10022

Re: **Epstein Matter**

Dear Dennis:

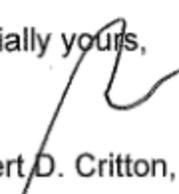
I am enclosing copies of the deposition of Mark Epstein and Larry Visoski and as well a copy of a court order dealing with a Motion for Protective Order which I filed related to inappropriate deposition questions, which as you will see from the transcript the court granted in part.

Please have the attorney who will be attending the deposition of Mr. Wexner contact me for any additional information.

I am aware other lawyers who have appeared on behalf of out of state third party witnesses have been reasonably successful in setting parameters regarding the types of questions that will be asked. I am confident everyone wants to keep "personal" information just that, personal.

I am equally certain that opposing counsel wishes to get any and all information on business dealings/financial dealings between Mr. Wexner and Mr. Epstein, past and current.

Cordially yours,


Robert D. Critton, Jr.

RDC/clz