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June 16, 2015

CONFIDENTIAL - FOR SETTLEMENT PURPOSES ONLY

VIA E-MAIL ONLY 

Jeff Herman, Esq.
Herman Law
41 Madison Avenue, 25th Floor
New York, NY 10014

Re: Claim of  against Jeffrey Epstein

Dear Mr. Herman:

Mr. Fudali's letter of June 5, 2015 has been received and forwarded to Mr. Epstein.

I have not yet discussed this letter with Mr. Epstein, however, in reviewing the information in the letter, I was struck with the fact that Ms.  alleges that the events giving rise to this potential claim occurred "from approximately 2002 - 2004 during the time Ms.  was 15 to 17 years old". Ms.  must have reached the age of majority in 2004 or 2005.

I am not licensed to practice in the State of New York and, therefore, I spoke with a New York attorney. I am informed that the Statute of Limitations for claims such as this is five (5) years from the date that the claimant reaches the age of majority if the alleged activity took place when the claimant was a minor.

Before going further in our discussions, I am curious if you have a theory which would, if proven, obviate what appears to be a claim that is barred by the running of the applicable Statute of Limitations.

I will look forward to hearing from you.

Very truly yours,

W. CHESTER BREWER, JR., ESQUIRE

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