

December 7, 2016

**Via Email:** [REDACTED]

**Joe Titone, Esq.**  
621 S.E. 5<sup>th</sup> Street  
Pompano Beach , FL 33060

**Re: Service of Process**

Dear Joe:

I have had an opportunity to review the Notice Service of Process that you filed in the Jean Luc Brunel/Jeffrey Epstein case. From my careful review it is clear that once again the attempt to serve runs afoul of Florida Statutes 48.031, as well as the holding in the Third District in HAUSER VS. SCHIFF. I have attached a copy of that case for your ready reference.

It is now almost two years past the January 2015 filing date of your clients' amended complaint joining Mr. Epstein as a defendant to the original action filed in August 2014. I remind you that no attempt was made to even serve Mr. Epstein until March 10, 2015. In that attempt the required Notice of Service was never filed with the Court, and which you, yourself, agreed in your later filed Motion for Reconsideration was an improper service. After rescheduling the hearing on Mr. Epstein's Motion to Quash, filed on April 29, 2015, and on four different occasions, you failed to appear. At the July 27, 2016 hearing that you, yourself, set more than a year after the date of Mr. Epstein's Motion to Quash you sought pardon from the Court for your continued neglect, claiming that you somehow misunderstood the date on which you were to appear, due to a brain issue, though it was you who cancelled the previously scheduled June 22, 2016 hearing date and specifically scheduled the hearing on July 27, 2016.

The Court's grant of an additional 120 days for service in deference to your medical issues did not confer on you a license to continue to disregard the jurisdictional prerequisites of proper service, with which you have failed to comply even after having had 681 days do so. The failure to properly serve Mr. Epstein, again is evident from the face of your Notice of Service of Process. No response to your clients' Amended Complaint is due or should be expected unless and until proper service is made. I remind you that the judge set a not later than 120 days following the Court's October 5, 2016 order.

Please be guided accordingly.

Very truly yours,

W. Chester Brewer, Jr., P.A.