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April 13, 2009

Via FaxRobert D. Critton, Jr.
Burman, Critton, Luttier & Coleman
515 N. Flagler Drive, Suite 400
West Palm Beach, FL 33401Re: *Jane Does 2-7 v. Jeffrey Epstein*

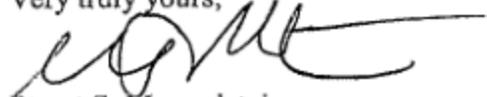
Dear Bob:

I am in receipt of your letter dated April 13, 2009. I do not at this time have any further response regarding the issue of non-party subpoenas on employers. Generally in these cases, it is our position that records can be obtained through authorizations, and that it would unnecessarily infringe on the Plaintiffs' privacy to serve employers with formal subpoenas. As to medical records, we advised you that a HIPAA compliant protective order should be in place for these records, if they are to be subpoenaed. I have not yet seen a proposed HIPAA compliant protective order in these cases.

With regard to your proposal to limit our clients to two depositions each, one as a party and one as a witness, we cannot agree. Requiring any Plaintiff to sit for more than one deposition would be burdensome, harassing and unnecessary.

With respect to consolidation for purposes of discovery, I do not understand your objection to such a limited consolidation. For one thing, it would seem to avoid the issue on how many depositions there should be of each Plaintiff. We are not withdrawing our request for the cases to be consolidated for discovery purposes only.

Very truly yours,



Stuart S. Mermelstein

SSM/lr