



**LEOPOLD-KUVIN<sup>TM</sup>**  
CONSUMER JUSTICE ATTORNEYS

August 14, 2009

Fax and Mail

Robert Critton, Esq.  
Burman Critton, et. al.  
515 N. Flagler Drive  
Suite 400  
West Palm Beach, FL 33401

Re: **B.B. v. JEFFREY EPSTEIN**  
**OUR FILE NO.: 080303**

Dear Bob:

Thank you for your letter of August 13, 2009. As you are well aware, if a witness appears for a deposition, there is no need to serve them with a subpoena. Since all these witnesses will be available and present at these depositions on these dates, and all the cases have been somewhat consolidated for discovery purposes, there is no need for a Florida subpoena to be served on these individuals. If you really believe it is necessary, I will file a motion to appoint a commissioner with Judge Hafele, and explain how you are making us jump through procedural hoops that are unnecessary given that fact that the witnesses will already be present.

We intend to fully participate in these depositions as we see fit.

Sincerely,

  
SPENCER T. KUVIN

STK:

cc: Jack Goldberger, Esq.