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November 20, 2009

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Re: [REDACTED] v. Jeffrey Epstein, Case No. 502008CA037319XXXMB AB

Gentlemen:

I represent the records custodian and a number of former and present officers of the Town of Palm Beach Police Department with respect to depositions that have been noticed and cross-noticed in the aforementioned case. The first of those depositions, of former Chief Michael Reiter, is scheduled to take place at 10:00 a.m. Monday, November 23rd at the offices of Leopold Kuvin, P.A. Additional depositions are scheduled as follows:

December 1, 2009	9:00 a.m.	Records Custodian
	1:00 p.m.	Detective Joseph Recarey
December 8, 2009	9:00 a.m.	Detective Michael Dawson

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1:00 p.m. Detective Michelle Pagan

December 9, 2009 9:00 a.m. Captain George Frick

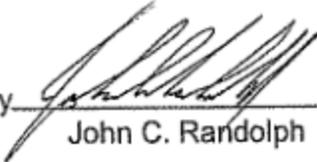
I understand that a number of related cases are pending against Mr. Epstein in Florida state and federal courts and that, in May 2009, Judge Kenneth Marra consolidated the related federal court cases for discovery and procedural purposes and directed that witnesses common to the multiple cases would be deposed only once. I further understand from conversations with Messrs. Critton and Kuvin that counsel in the related state court cases have adopted the same practice, namely, that witnesses in these related cases be deposed only once.

Finally, I understand that although you have been made aware of these depositions, you have not cross-noticed them for use in your cases. I therefore assume that you do not intend to take their depositions at a later date. Please contact me immediately if this assumption is incorrect.

Sincerely,

JONES, FOSTER, JOHNSTON & STUBBS, P.A.

By



John C. Randolph

JCR:mtm

cc: Robert Critton, Esquire
Spencer T. Kuvin, Esquire

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