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December 9, 2009

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**Sent by Facsimile, E-mail and U.S. Mail**

Spencer T. Kuvin, Esq.  
Leopold-Kuvin, P.A.  
2925 PGA Blvd., Suite 200  
Palm Beach Gardens, FL 33410

Re: **B.B. v. Epstein**  
**(Depositions of Robert Meister and Todd Meister)**

Dear Mr. Kuvin:

Your office had scheduled the deposition of Robert Meister and Todd Meister for Monday, December 14, 2009, now which have been cancelled. Based on all the information which I have been able to gather regarding these individuals, neither of these gentlemen have any relevant or material information regarding your client, B.B. Your client was on Mr. Epstein's house on one occasion. Nowhere in her answers to interrogatories, or various amendments which you have served, does she reference either Robert Meister or Todd Meister.

Neither of these depositions serves any purpose other than to harass and intimidate each of the witnesses and to dramatically increase the costs associated with the lawsuit which your client has brought against Mr. Epstein. We consider that the taking of these depositions, which serve no purpose, to be an abuse of the litigation process.

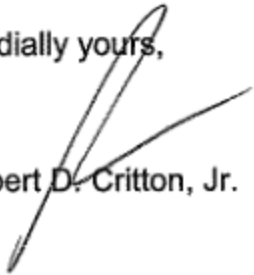
You took the deposition of former chief of police, Michael Reiter on November 23, 2009. I don't recall one question which you ever asked of the chief regarding your client, B.B. Yet, you spent 4 or 5 hours questioning him about an investigation in which he did not participate and had no personal knowledge. His deposition was a waste of everyone's time. There was no information obtained from the deposition which can be utilized as admissible evidence at the time of the B.B. trial. Taking the deposition of former Chief Reiter is another example of an abuse of the judicial process as it relates to your client's claim against Mr. Epstein. Her case will rise and fall on the facts of her case, not extraneous depositions which were or are being taken for the sole purpose of

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harassing and intimidating witnesses and causing Mr. Epstein to spend tens of thousands in defending depositions and discovery which serve no purpose.

You, Brad Edwards and other attorneys who have filed suits against Mr. Epstein told me that you have conferred at least bi-weekly and shared information. Consider yourself on notice that we intend to vigorously defend against post and future abusive litigation in these cases.

Cordially yours,



Robert D. Critton, Jr.

RDC/clz

cc: Jack Goldberger, Esq.

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