

J. MICHAEL BURMAN, P.A.<sup>1,2</sup>  
GREGORY W. COLEMAN, P.A.  
ROBERT D. CRITTON, JR., P.A.<sup>1</sup>  
BERNARD A. LEBEDEKER  
MARK T. LUTTIER, P.A.  
JEFFREY C. PEPIN  
MICHAEL J. PIKE  
HEATHER MCNAMARA RUDA  
DAVID A. YAREMA

<sup>1</sup>FLORIDA BOARD CERTIFIED CIVIL TRIAL LAWYER

<sup>2</sup>ADMITTED TO PRACTICE IN FLORIDA AND COLORADO

December 11, 2009

ADELOU J. BENAVENTE  
PARALEGAL/INVESTIGATOR  
JESSICA CADWELL  
BOBBIE M. MCKENNA  
ASHLIE STOKEN-BARING  
BETTY STOKES  
PARALEGALS  
RITA H. BUDNYK  
OF COUNSEL  
EDWARD M. RICCI  
SPECIAL CONSUMER  
JUSTICE COUNSEL

**Sent By E-mail Only**

Jeffrey Epstein

Re: **B.B. v. Epstein**

Dear Jeffrey:

I know Connie sent you Mr. Kuvin's December 4, 2009 letter and his Motion for Sanctions pursuant to §57.105 Fla. Stat. directed to you and my law firm. The applicable statute allows for sanctions to a prevailing party to the extent any claim or defense made during the course of the civil proceeding or action is determined by the court to be not supported by the material facts necessary to support the claim or defense or not be supported by the application of then existing law to those facts.

I believe the motion would not have been filed unless we believed there was a good faith belief for its filing against Mr. Kuvin. As well, I am not certain that the motion which we filed would be deemed to be a "claim or defense" which would be governed by a §57.105 Fla. Stat.

However, I want you to understand the risk. I do not intend to do the research, unless you direct me to do so, as to whether or not a motion falls within the claim or defense language of the statute.

If you wish us to withdraw the motion which we filed directed to Mr. Kuvin, we will do so. Let me know before Christmas day, otherwise the motion will stand.

Cordially yours,

  
Robert D. Critton, Jr. (cc)

RDC/clz

cc: Jack Goldberger, Esq.  
Darren Indyke, Esq.  
Michael J. Pike, Esq.

J. MICHAEL BURMAN, P.A.<sup>1,2</sup>  
GREGORY W. COLEMAN, P.A.  
ROBERT D. CRITTON, JR., P.A.<sup>1</sup>  
BERNARD A. LEBEDEKER  
MARK T. LUTTIER, P.A.  
JEFFREY C. PEPIN  
MICHAEL J. PIKE  
HEATHER MCNAMARA RUDA  
DAVID A. YAREMA

<sup>1</sup>FLORIDA BOARD CERTIFIED CIVIL TRIAL LAWYER

<sup>2</sup>ADMITTED TO PRACTICE IN FLORIDA AND COLORADO

ADELQJI J. BENAVENTE  
PARALEGAL/INVESTIGATOR  
JESSICA CADWELL  
BOBBIE M. MCKENNA  
ASHLIE STOKEN-BARING  
BETTY STOKES  
PARALEGALS  
RITA H. BUDNYK  
OF COUNSEL  
EDWARD M. RICCI  
SPECIAL CONSUMER  
JUSTICE COUNSEL

December 11, 2009

**Sent by Fax and U.S. Mail**

John G. White, III, Esq.  
Richman Greer Weil Brumbaugh Mirabito & Christensen  
250 Australian Avenue, South, Suite 1504  
West Palm Beach, FL 33401

Re: **Special Master Fee Dispute Hearing between  
Jeffrey Epstein and the Podhurst Orseck Firm**

Dear Jay:

As per our conversation approximately four to six weeks ago, you agreed to serve as a fee expert in the above-styled matter. Our firm will be responsible for your fee.

Initially, Sid Stubbs was going to be the special master, but we are working on someone new. Sid decided that he had a conflict in that the Town of Palm Beach is involved in some of the discovery issues

I will keep you advised.

At the current time, I am having a spreadsheet prepared for the approximately \$2 million worth of fees that Bob Josefsberg and his firm were seeking from Epstein. The spreadsheet should be of great assistance in attempting to determine reasonable value of the services rendered.

Cordially yours,

  
Robert D. Critton, Jr. (clz)

RDC/clz