

**DRAFT**

January 4, 2010

**Sent By Facsimile and U.S. Mail**

Kenneth [REDACTED] Byrk  
The Florida Bar  
1200 Edgewater Drive  
Orlando, FL 32804-6314

Re: **Complaint Against William Joseph Berger, Attorney No. 197701  
Case No. 2010-50,747 (09B)**

Dear Mr. Byrk:

I am responding to your December 3, 2009 letter. As I am certain you are aware, the Scott Rothstein/Rothstein, Rosenfeldt & Adler matter has continued to provide information which suggests that Mr. Berger who professed to be a partner at RRA, either knew or should have known that Mr. Rothstein and others were involved in the sale of tort cases which had been filed and/or were to be filed against me. Other than the three cases which were filed, I am unaware of any other potential claimants which Mr. Berger and/or RRA represented.

I am enclosing a copy of the complaint which was filed against Mr. Rothstein, Mr. Edwards and one of the Plaintiffs, [REDACTED]. Within that lawsuit, it sets forth information that has been made to the public and/or to my attorneys. Within the lawsuit, there is a reference to a suit filed by Attorney William Scherer from Fort Lauderdale which contains, in part, similar allegations regarding the Rothstein firm.

While Mr. Edwards was the principal lawyer who was directing the discovery of these cases, William Berger from the firm was working with Mr. Edwards and was an active participant in some depositions and hearings. He also did appellate work.

As you also probably know, the initial lawsuit that was filed by Mr. Rosenfeldt on behalf of the firm against Scott Rothstein is now stayed based upon the bankruptcy filing that was made. My attorneys had filed motions to preserve evidence that was in the possession of Mr. Edwards and as well within the firm and sought to take the depositions of Mr. Edwards and Mr. Rosenfeldt as well as the then receiver and now bankruptcy trustee, Herbert Stettin. Those depositions were stayed by either the bankruptcy court or a circuit court which have prevented us from obtaining any additional information.

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I have been advised that because of the bankruptcy proceeding and because of the stay which Mr. Edwards sought and was granted in two state court cases in which he represents Plaintiffs through December 21, 2009, information in the form of testimony and documents has not yet been made available to us.

The Palm Beach Post stated that it was inconceivable that the other "partners" in the firm (those individuals who held themselves out to be partners up until the time of the implosion) did not know what was going on at the firm or should have been very concerned and inquisitive based upon the manner in which the financial records were being kept, the limited access to Mr. Rothstein and various financial records, including trust accounts.

If you review the complaint which we filed, you will see the active role that we believe that Mr. Berger played in the Rothstein scheme/scandal.

Cordially yours,

Jeffrey Epstein

cc: Robert D. Critton, Jr., Esq.  
Jack A. Goldberger, Esq.

**DRAFT**

January 4, 2010

**Sent By Facsimile and U.S. Mail**

Kenneth H.P. Byrk  
The Florida Bar  
1200 Edgewater Drive  
Orlando, FL 32804-6314

Re: **Complaint Against Bradley James Edwards, Attorney No. 542075  
Case No. 2010-50,746 (09B)**

Dear Mr. Byrk:

I am responding to your December 3, 2009 letter. As I am certain you are aware, the Scott Rothstein/Rothstein, Rosenfeldt & Adler matter has continued to provide information which suggests that Mr. Edwards, who professed to be a partner at RRA, either knew or should have known that Mr. Rothstein and others were involved in the sale of tort cases which had been filed and/or were to be filed against me. Other than the three cases which were filed, I am unaware of any other potential claimants which Mr. Edwards and/or RRA represented.

I am enclosing a copy of the complaint which was filed against Mr. Rothstein, Mr. Edwards and one of the Plaintiffs, [REDACTED]. Within that lawsuit, it sets forth information that has been made to the public and/or to my attorneys. Within the lawsuit, there is a reference to a suit filed by Attorney William Scherer from Fort Lauderdale which contains, in part, similar allegations regarding the Rothstein firm.

Mr. Edwards was the principal lawyer who was directing the discovery of this case. Mr. Edwards was working with William Berger from the firm who was an active participant in deposition and in hearings.

As you also probably know, the initial lawsuit that was filed by Mr. Rosenfeldt on behalf of the firm against Scott Rothstein is now stayed based upon the bankruptcy filing that was made. My attorneys had filed motions to preserve evidence that was in the possession of Mr. Edwards and as well within the firm and sought to take the depositions of Mr. Edwards and Mr. Rosenfeldt as well as the then receiver and now bankruptcy trustee, Herbert Stettin. Those depositions were stayed by either the bankruptcy court or a circuit court which have prevented us from obtaining any additional information.

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The Palm Beach Post stated that it was inconceivable that the other "partners" in the firm (those individuals who held themselves out to be partners up until the time of the implosion) did not know what was going on at the firm or should have been very concerned and inquisitive based upon the manner in which the financial records were being kept, the limited access to Mr. Rothstein and various financial records, including trust accounts.

If you review the complaint which we filed, you will see the active role that we believe that Mr. Edwards played in the Rothstein scheme/scandal.

Cordially yours,

Jeffrey Epstein

cc: Robert D. Critton, Jr., Esq.  
Jack A. Goldberger, Esq.