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March 22, 2010

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Sent by E-Mail Only

Aaron Podhurst, Esq.

Re: **Epstein Matter**

Dear Aaron:

I advised you that I would get back in touch with you today regarding our discussion on March 12th. At that meeting, we were advised that you had three new clients, [REDACTED]. We were also advised that you had three additional individuals who had contacted your firm but had not yet signed a representation agreement.

After carefully discussing the matter among ourselves, we came to the conclusion that it would be inappropriate to commingle the outstanding issue of your fees and the representation which you have of your three new clients (separate and apart from Jane Doe 103, which we previously attempted to resolve, but without success).

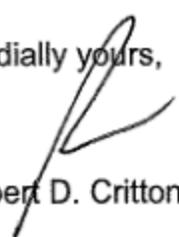
Therefore, we would first like to resolve the outstanding three cases which your firm currently has in furtherance of Mr. Epstein's obligations under the NPA. While we have not received the demand from you, in order to resolve these cases, Mr. Epstein is extending an offer of \$50,000 to each of the above individuals (excluding Jane Doe 103) and in return, would expect a release to be signed in a form similar to that upon which was agreed at the end of 2009 with regard to those individuals were suit had not yet been filed. This offer is open for a period of fourteen (14) days from the date of this letter. If you believe additional time is necessary to contact your clients and to discuss resolution, please advise and we will consider extending the time frame.

At the conclusion/resolution of those cases, Mr. Epstein would be prepared to discuss resolution of the outstanding attorneys' fee/cost issues.

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To the extent that you are representing any additional individuals as of the date of this letter, please advise and we will consider resolving those matters as well.

Cordially yours,



Robert D. Critton, Jr.

RDC/clz

cc: Robert Josefsberg, Esq.
J. Michael Burman, Esq.

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