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April 23, 2010

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CONFIDENTIAL; SETTLEMENT NEGOTIATIONS

Sent by E-mail Only

Robert Josefsberg, Esq.
Podhurst Orseck, P.A.

Re: Epstein Matter, [REDACTED] and 103

Dear Bob:

Thank you for meeting with Jeffrey and me on Wednesday. I want to make certain that I have a clear understanding regarding the offers and demands that were made when we departed.

You currently represent [REDACTED]

As to [REDACTED] you demanded \$500,000 to settle all four cases inclusive of attorneys fees and costs which are claimed by your firm pursuant to the NPA and inclusive of fees and costs with regard to [REDACTED] whom you indicated was not on the NPA list and whom your firm was representing on a contingency basis.

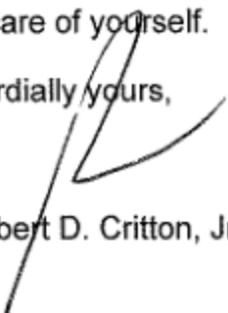
Mr. Epstein offered to resolve all four of the above cases and [REDACTED] or the sum of \$750,000.00. The \$750,000 offer was inclusive of attorneys fees related to Scala as set forth above and as well, included full and complete resolution of the [REDACTED] case. Fees and costs related to [REDACTED] are not included in the \$750,000.00 offer.

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I believe the above sets forth our current positions.

Equally important, take good care of yourself.

Cordially yours,



Robert D. Critton, Jr.

RDC/clz