

June 22, 2010

Charles H. Lichtman, Esq.
Berger Singerman PA
350 E. Las Olas Blvd., Suite 1000
Ft. Lauderdale, FL

RE: Epstein v. Rothstein

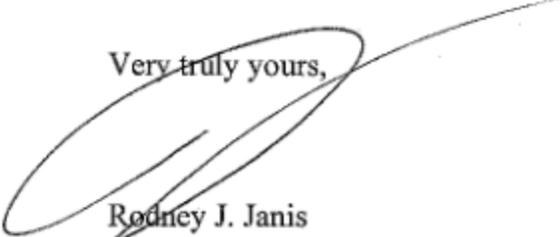
Dear Mr. Lichtman:

In light of your recent decision not to produce any emails as it relates to the Epstein v. Rothstein subpoena, please provide us a privilege log for the same. In addition, since the emails only encompass a very small portion of the requested items in our subpoena of April 16, 2010, please immediately provide the remaining items requested in the subpoena. If you decide to claim a privilege for any remaining items, please note that the subpoena in question was properly served over two months ago, with no objections filed and no privilege log filed within the time specified by the rules.

In addition, as you know, it has come to our attention that there may be a fabricated settlement agreement, to the tune of \$200 million dollars, relating to Jeffrey Epstein. Mr. Epstein has never settled any case for anywhere near that amount of money. We have reason to believe that this fabricated settlement agreement is contained in the documents held by the Trustee. I'm sure you can understand the obvious importance of this document to Mr. Epstein. If you want to claim a privilege on the emails, then we can have the Judge decide if that's proper, however, I see no basis for refusing to turn over, or claiming a privilege for, a purported fabricated document. This item, and similar items, were requested in our April 16, 2010 subpoena and I'd like to make arrangements to obtain this document immediately.

As we've mentioned to you, Drew Hinkes and Luis Torres, we are ready to pay the reasonable costs involved to obtain these documents; the Bankruptcy Court has approved a document inspection protocol; the Bankruptcy Court has addressed the privilege issue; and thus we see no reason why your office will not comply with our subpoena. We have set a Motion to Compel for hearing in front of Judge Crow for next week, for which you have already received notice, and please accept this as our attempt to amicably resolve these issues without the need for court intervention.

Very truly yours,


Rodney J. Janis

cc: Jack Goldberger