

March 29, 2010

Jeffrey Sloman
United States Attorney
Address
Miami


USAO – W Palm Beach

Robert Senior
Address

Re Jeffrey Epstein

Dear Counsel

On April 5, 2010, Jeffrey Epstein has a deadline for filing a responsive Motion to Dismiss and thereafter an Answer to claims brought by Jane Doe 103 pursuant to 18 USC 2255 that were referenced in our earlier letter to you dated March 5, 2010 to which there has been no response. We firmly believe that the issues raised in the draft motion that we append hereto do not conflict with nor, if filed, breach Mr. Epstein's obligations under the NPA.

Please advise if any of the issues in the draft motion authored by his civil counsel Robert Critton are, from your perspective, in conflict with the 2255 provisions of the NPA so that we may reassess our legal opinion that Mr. Epstein's civil counsel can litigate the legal issues contained in the draft motion without fear that the litigation will be construed by your Office as being in violation of the NPA. If the Government believes that any of the issues intended to be raised in defense of the Jane Doe 103 lawsuit are in breach of Mr. Epstein's obligations under the NPA, we request notice so that we could decide before any filing whether to file a Declaratory Judgment action asking the Court presiding over the Jane Doe 103 lawsuit to determine whether the raising of the issue by motion or defense would be in conflict with Mr. Epstein's contractual duties under the NPA or to withdraw the issue to the extent we become convinced that your position, if in conflict with ours, is correct.

Again, Mr. Epstein's paramount priority, and ours, is that the terms of Mr. Epstein's agreement with the Government be followed and fulfilled.

YT
RB
MGW