

Dear [REDACTED]

We author this letter to advise you of the status of Mr. Epstein's ongoing settlement discussions with the attorney-representative Robert Josefsberg. First, during the week of April 26, 2010 Mr. Epstein settled each and every case and potential case with all of Mr. Josefsberg's clients including the litigation styled Jane Doe 103 v Epstein. The claims or potential claims of each person on your victim list who chose to rely on the attorney representative have been fully resolved to the satisfaction of Mr. Josefsberg.

The last remaining issue relating to the attorney-representative is the issue of legal fees. A final accounting has not yet been presented to Mr. Epstein by Mr. Josefsberg or his firm. We have sought such an accounting as a predicate to determining the extent to which the charges are within Mr. Epstein's NPA-related obligations which he reaffirms unconditionally and to avoid reaching interim settlements that are then followed by additional invoices which potentially include disputed charges. As we have previously stated, amongst the invoices are charges that Mr. Epstein's civil counsel believe are outside his NPA-obligations.

Mr. Epstein has executed a Special Master Agreement offering to have all outstanding fee-related issues resolved by a neutral third party and also remains available to continue settlement conversations aimed at the same objective, a final resolution of the fee issues. As of the present, the attorney-representatives lawyers are indicating they prefer to initiate litigation rather than submit the dispute to a neutral third party or to continue discussions with Mr. Epstein's counsel to reach an amicable and non-adversarial resolution of the issues thus their continues to remain a significant outstanding balance which is in dispute and thus unpaid. Again, Mr. Epstein awaits a final accounting of outstanding invoices through the date of the settlement of the last five cases or potential cases, so that further efforts to reach an overall settlement of all NPA-obligations can be achieved with finality