

GENERAL RELEASE

KNOW ALL MEN BY THESE PRESENTS THAT:

For and in consideration of the exchange of mutual releases and the dismissal with prejudice of the case captioned Jeffery E. Epstein vs. D. Eric Williams a/k/a Eric Williams, Hairoun Aviation Services, Inc., R. Pearlitha Williams and Josephine Simmons, including the complaint and counterclaim, filed in the Superior Court of the Virgin Islands, Division of St. Thomas and St. John, Case No. ST-09-CV-307, with each party to bear its own attorney's fees and costs, the receipt and sufficiency of which are hereby acknowledged, the undersigned, Jeffrey E. Epstein, does forever acquit, remise and release D. Eric Williams, a/k/a Eric Williams, R. Pearlitha Williams and Josephine Simmons, and each and every one of their heirs, personal representatives, agents, employees and representatives and Hairoun Aviation Services, Inc., and each and every one of its respective officers, directors, agents, shareholders, employees, and representatives, and each of the successors, assigns and attorneys of D. Eric Williams, a/k/a Eric Williams, R. Pearlitha Williams, Josephine Simmons and Hairoun Aviation, Inc. (hereinafter the "Releasees"), of and from any and all manner of actions and causes of actions, judgments, claims, demands, damages, or rights of whatsoever kind or nature arising from, or by reason of any and all known or unknown damages of any kind, including, without limitation, known or unknown financial loss and/or the consequences thereof, which heretofore have been or which hereafter may be sustained by the Releasor, and his heirs, personal representatives, successors, assigns, or by any and all other persons, for all claims or rights of action for damages which Releasor has or may hereafter have related to, connected with and/or as a result of the alleged acts of the Releasees set forth in the Complaint filed in that certain action instituted in the Superior

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Court of the Virgin Islands, Division of St. Thomas and St. John, captioned Jeffery E. Epstein vs. D. Eric Williams a/k/a Eric Williams, Hairoun Aviation Services, Inc., R. Pearlitha Williams and Josephine Simmons filed in the Superior Court of the Virgin Islands, Division of St. Thomas and St. John, Case No. ST-09-CV-307, and/or any and all matters in any way related thereto or connected therewith.

Further, for and in consideration of the above-described exchange of mutual releases and dismissal with prejudice, the UNDERSIGNED RELEASOR ALSO EXPRESSLY DECLARES AND AGREES:

1. That all claims, past, present and future, are disputed and this release is part of a full and final settlement representing a compromise resolution of such disputed claims and shall never be treated as evidence of liability, nor as an admission of liability or responsibility at any time or in any manner whatsoever;

2. That this release covers and includes all claims several or otherwise, past, present or future, which can or may ever be asserted by any person or persons against Releasees, as heirs, spouse, children, successors, assigns, or otherwise, as the result of damages, financial loss and/or other matters as to which this release has been granted, as aforesaid, or the effects or consequences thereof;

3. That this full and final release shall cover and include all and any future damages, harm, injuries and/or losses not now known to any of the parties hereto but which may later develop or be discovered, including, without limitation, the effects or consequences thereof, and including all causes of action therefor;

RELEASOR FURTHER STATES that he has carefully read the foregoing General Release and knows the contents thereof, and he signs the same as his own free act.

