



LEOPOLD-KUVINTM
CONSUMER JUSTICE ATTORNEYS

January 7, 2010

Via Fax and Mail

Robert Critton, Esq.
Burman Critton, et. al.
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

Re: B.B. v. JEFFREY EPSTEIN
OUR FILE NO.: 080303

Dear Bob:

Thank you for your letter of January 7, 2010. Initially, I find it interesting that you respond to my request for deposition dates of Mr. Goldsmith while ignoring all of my correspondence regarding the motion you currently have set for January 26, 2010. Regardless, I respectfully disagree with your analysis of what information Mr. Goldsmith may have that is relevant to my client's case.

As you will note in my Amended Complaint, we have alleged that there is a much larger conspiracy with respect to Mr. Epstein and his criminal sex organization. As you are well aware, my client was only one of many girls who were procured by Mr. Epstein in continuance of this illegal conspiracy. Further, other similar bad act evidence is relevant and admissible under Fla. Stat. §90.404.

It is clear from the evidence that has already been generated in this litigation that Mr. Goldsmith was having conversations directly with Mr. Epstein at or around the time of the police investigation. You further know, through the deposition of Chief Reiter, that Mr. Goldsmith was attempting to persuade Chief Reiter to drop his investigation of Mr. Epstein, so much so that he bordered on illegal conduct according to Chief Reiter. I believe that it is entirely reasonable that as a result of Mr. Goldsmith's conversations with Mr. Epstein, and his subsequent conversations with Chief Reiter, that he likely has relevant information regarding the illegal sexual enterprise being run by Mr. Epstein out of his home at or around the time that my client was taken there. It is also reasonable to assume that given Mr. Goldsmith's close relationship with Mr. Epstein that he may have been at the home when certain girls were taken there, and may have discussed the facts of this case and the prosecution of Mr. Epstein with him directly.

January 7, 2010

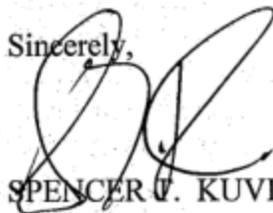
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While I understand that you may respectfully disagree with my intention to proceed with this deposition, I reasonably believe that it may lead to the discovery of relevant and potentially admissible information. If you disagree, I am more than willing to set this deposition in the future with enough time for you, or Mr. Goldmith, to file the appropriate Motion for Protective Order so that we may discuss this directly with the Court.

Please let me know how you would like to proceed. I would like to schedule this deposition for a mutually convenient date so that if the Court denies any Motion for Protective Order, the deposition can proceed as scheduled.

Please give me a call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to be 'Spencer V. Kuvvin', written over the typed name.

SPENCER V. KUVIN

STK:mlb



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THIS LETTER IS MADE PURSUANT TO FLA. STAT. § 90.408

Via e-mail, fax and mail

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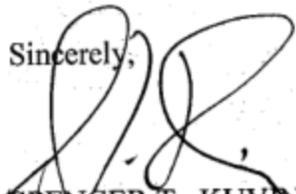
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OUR FILE NO.: 080303

Dear Robert:

It has come to my attention that your client is accusing certain attorneys of failing to attempt to negotiate, and potentially resolve their cases. Please be advised that, I have always been, and continue to be interested in sitting down with you and your client in order to have a reasonable discourse and discussion about the potential resolution of the B.B. case, as well as other client(s) that I may represent. As you are aware, early on in this case we served a Proposal for Settlement. If your client would like to engage in reasonable and good faith discussions in an attempt to amicably resolve this matter, my door is always open and I would always take your call. Obviously, it does no one any good to litigate a case if an amicable resolution can be reached. From my client's perspective, she would be much more inclined to have these discussions before her and her family are forced to go through what would likely be a difficult and lengthy deposition process.

Please let me know at your soonest convenience how you would like to proceed in this regard.

Sincerely,



SPENCER T. KUVIN

STK:mlb