

From: Jeffrey Epstein <jeevacation@gmail.com>
To: "[REDACTED]" <[REDACTED]>
Subject: Fwd:
Date: Fri, 04 Dec 2009 04:38:37 +0000

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From: Robert D. Critton Jr. <[REDACTED]>
Date: Thu, Dec 3, 2009 at 6:10 PM
Subject:
To: Jeffrey Epstein <jeevacation@gmail.com>
Cc: Darren Indyke <[REDACTED]>, Martin Weinberg <[REDACTED]>, "Michael J. Pike" <[REDACTED]>

This is the semi final version. So need comments to finalize.

However I think that berger and adler should not yet be sued. There are not enough facts at his time to support and I think a 57.105 motion will be filed which places the filing lawfirm and je at risk for sanctions and potential suit. je, you may not care, but I do as to my firm.

I also now have given a copy of the complt to my other partners. The unanimous opinion is that we are material witnesses to the acts alleged, more so than je and therefore have an immediate conflict; my partner coleman has that issue in another case currently; he also is on the bd of governors for the fla bar and sits on the big grievance comm. And is dealing w roth and others and thinks we are also conflicted there as well.

So I will finish the complt so that it can be filed on Monday, but some other firm will need to file. Think you said roy 's civil attys could do. He obviously feels strongly about filing from what I have seen and is familiar w the facts. I will coordinate, let me know, bob

Robert D. Critton, Jr.

[REDACTED]
Burman, Critton, Luttier & Coleman, LLP

303 Banyan Boulevard, Suite 400

West Palm Beach, FL 33401
[REDACTED]

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