

November 30, 2018

Scott J. Link, Esquire
LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Blvd., Suite 930
West Palm Beach, FL 33401

Re: Epstein

Dear Scott:

Your correspondence of November 29, 2018 has been forwarded to the undersigned. Until further notice, please direct any future correspondence not directly related to the Show Cause proceedings to the undersigned. Further, on any correspondence which may pertain to the Show Cause proceedings, please copy the undersigned.

Having now reviewed your correspondence in detail, on behalf of the Firm, we categorically deny any allegations of wrongdoing and reject your demand for \$3 million. During its representation of Mr. Epstein, the Firm diligently pursued issues pertaining to the privilege log and production of documents and was continuing its pursuit of these issues at the time of its termination by your client more than six (6) years ago. In reviewing your selected excerpts from Judge Hafele's statements, it is clear you are attempting to place a context which the Court did not intend. Judge Hafele was upset that he was being asked to look at potentially up to 27,000 documents on the eve of trial when the issue of the privileged document had been known and unresolved for at least the previous six years. None of the firms which succeeded ours, including your own, attempted to pursue the issue of the privileged documents during that six years although the case remained pending after our discharge. In fact, none of the successor firms ever attempted to review our files until you did in January of this year. Mr. Epstein, and his legal team, were well aware that the issue of the privileged documents remained unresolved at the time of our discharge.

As to the recent Show Cause proceedings, Judge Ray's order speaks for itself. I will not comment on your claim of \$1,000,000 for fees incurred for a proceeding which involved two depositions and no other written discovery. I am sure that time sheets will reveal that the vast majority of your time was devoted to attempting to gain the admissibility of documents for the defense of Mr. Epstein in the state court proceeding and, in fact, the Firm's possession of the disc and the proceeding before Judge Ray may ultimately prove beneficial to you and Mr. Epstein in that regard.

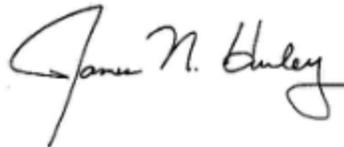
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Likewise, we disagree entirely regarding the enforceability of the General Release which Mr. Epstein executed with full benefit of legal counsel. The terms are clear and unambiguous. The only specific issue of wrongdoing you have raised pertains to the Firm's alleged failure to pursue privileged documents over six years ago. Again, Mr. Epstein was well aware that this issue remained unresolved at the time of our discharge in 2012, prior to his execution of the release. Not only are any of these allegations covered by the release, they would also be effectively time barred.

Finally, we are sure you understand that you and others in your firm will be material witnesses in any action which Mr. Epstein may contemplate against the Firm and therefore will be ethically precluded from representing Mr. Epstein any such proceeding.

Very truly yours,

A handwritten signature in black ink, appearing to read "James N. Hurley". The signature is written in a cursive, flowing style with a large initial "J" and a long, sweeping underline.

James N. Hurley
General Counsel

cc: Joseph Ianno, Jr., Esquire
Niall McLachlan, Esquire