

November 15, 2017

Scott J. Link
Board Certified Business Litigation

CONFIDENTIAL SETTLEMENT COMMUNICATION

VIA E-MAIL

Jack Scarola
Searcy, Denney, Scarola, Barnhart
& Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
[REDACTED]

VIA E-MAIL

Bradley J. Edwards
Edwards Pottinger LLC
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33401
[REDACTED]

RE: *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*
15th Judicial Circuit Case No. 50-2009CA040800XXXXMBAG

Dear Jack and Brad:

Our client has watched the video of Brad's deposition and asked us to extend a final settlement offer, which will remain open until **5:00 p.m. on Friday, November 17, 2017.**

Having reviewed Brad's testimony and demeanor at his recent deposition, we strongly suggest that Brad reevaluate his position. Our client has authorized us to offer Brad a "walk away." That is, he suggests that the parties enter into a Mutual General Release and Brad dismiss his Counterclaim with prejudice, with each side to bear his own attorneys' fees and costs. If Brad would like to protect his reputation and keep the settlement confidential, we are willing to agree to a confidentiality agreement.

This litigation has been pending a long time. In light of attorneys' fees incurred from the date of Mr. Epstein's earliest Proposal for Settlement and those which will be incurred to try this case, Brad's potential personal liability will be well in excess of \$2 million. Based on the information we have gathered, we suspect a judgment of that magnitude will result in Brad having to file personal bankruptcy. If we end this now, each side will walk away and avoid that result.

We look forward to receiving your response by Friday, November 17, 2017, at 5:00 p.m.

Sincerely,

Scott J. Link