

April 3, 2018

*Via Email*

Niall T. McLachlan  
Carlton Fields Jordan Burt, P.A.  
100 S.E. Second Street, Suite 4200  
Miami, FL 33131  
[REDACTED]

*Via Email*

Joseph Ianno Jr.  
Carlton Fields Jordan Burt, P.A.  
CityPlace Tower, Suite 1200  
525 Okeechobee Boulevard  
West Palm Beach, FL 33401-6350  
[REDACTED]

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

Dear Niall and Joe:

This letter is Jeffrey Epstein's demand to Fowler White, pursuant to section 627.4137, Florida Statutes, for the following:

A statement under oath of a corporate officer for Fowler White or Fowler White's insurer's claim manager or superintendent setting forth the following information with regard to each known policy of insurance, including excess or umbrella insurance, that would cover any claim that has or may result from Fowler White's retention of documents and/or a disc that (1) Farmer Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., (2) Bradley J. Edwards, and (3) L.M., E.W. and Jane Doe have alleged were improperly retained:

- a. The name of the insurer;
- b. The name of each insured;
- c. The limits of the liability coverage;
- d. A statement of any policy or coverage defense which such insurer reasonably believes is available to such insurer at the time of providing the statement; and
- e. A copy of the policy(ies).

Please provide this information within 30 days as required by the statute. Thank you for your attention to this matter.

Sincerely,

Scott J. Link

SJL/tlc