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January 23, 2019

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MICHAEL L. SCHEVE
(1980-2011)

¹ ADMITTED TO PRACTICE IN FLORIDA AND NEW YORK

**VIA CERTIFIED US MAIL, RETURN
RECEIPT REQUESTED AND EMAIL**

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Fort Lauderdale, FL 33301

RE: *Jeffrey Epstein v. Scott Rothstein and Bradley Edwards*
15th Judicial Circuit Case No. 50-2009-CA-040800XXXXMBAG

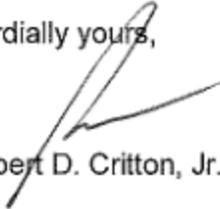
Dear Sir & Madam:

I received the enclosed letter dated January 11, 2019 from Scott Link on behalf of Jeffrey Epstein regarding the above-referenced matter. Based on the letter, I hereby demand that you and your firm preserve all files, communications, proposed/draft complaints, discovery and correspondence (including electronic correspondence, e-mail communication, text messages, instant messages, and documents of any nature) related to Jeffrey Epstein and the above-referenced matter. This request for preservation includes all communications in your possession between me, my firm and all other lawyers representing Jeffrey Epstein from October 30, 2009 through the current date, with Jeffrey Epstein and his agents, attorneys or representatives regarding Scott Rothstein or Bradley Edwards, the above-referenced case and the underlying cases brought by Bradley Edwards against Jeffrey Epstein. The attorneys include but not limited to Darren Indyke, Alan Dershowitz, Martin Weinberg, Jack Goldberge, the lawyers listed above and Scott Link. This request to preserve includes all notes, drafts of complaints or other pleadings, and any other work product prepared for or at the direction of Jeffrey Epstein.

At this time, I hereby request that you not destroy any of your files related to the above-referenced matter and individuals. Please ensure that all electronic data, including e-mail and text messages are preserved.

As you are aware, Florida law recognizes the spoliation of evidence. Failure to comply with this notice can result in sanctions being imposed by the Court and liability in tort for spoliation of evidence or potential evidence. In the event that the you and/or your agent, lose, destroy, conceal, or otherwise cause the requested evidence to be unavailable after the receipt of this letter, then it may be presumed that the evidence (or document) was destroyed because it was unfavorable to you, your client and/or your agents.

Cordially yours,



Robert D. Critton, Jr.

Enclosures: Scott Link's letter to Critton, January 11, 2019

January 11, 2019

VIA E-MAIL

Robert D. Critton, Jr.
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401
rcrit@lawole.com

Re: *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*
15th Judicial Circuit Case No. 50-2009-CA-040800XXXXMBAG

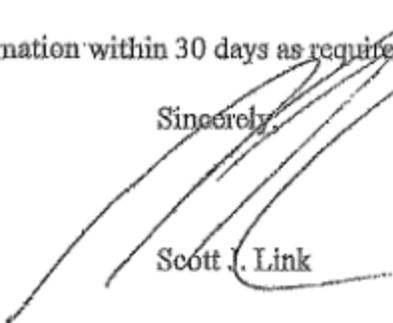
Dear Mr. Critton:

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

1. A statement under oath 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 your drafting and filing of the original Complaint on Mr. Epstein's behalf in the above-referenced matter:
 - a. The name of the insurer;
 - b. The name of each insured;
 - c. The limits of the liability coverage; and
 - 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.
2. Copies of all policies of insurance that would cover such claim.

Please provide this information within 30 days as required by Florida Statutes.

Sincerely,


Scott J. Link

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