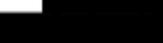


Joseph L. Ackerman, Jr.

( direct  
 fax

April 4, 2011

**VIA EMAIL AND FIRST CLASS MAIL**

Jack Scarola, Esquire  
Searcy Denney Scarola et al.  
2139 Palm Beach Lakes Boulevard  
P.O. Drawer 3626  
West Palm Beach, FL 33409

**Re: Jeffrey Epstein v. Scott Rothstein, individually, Bradley J. Edwards,  
individually, and L.M., individually  
PBC Circuit Case No. 502009CA040800XXXXMBAG  
Our File No. 80743**

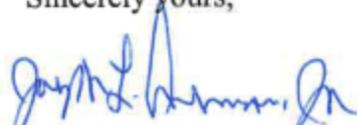
Dear Jack:

I cleared the May 23, 2011 deposition date with your office today regarding the taking of the deposition of Alfred Seckel in Malibu, California.

Pursuant to my recent correspondence to you, We advised you that we do not consider this witness to have any information likely to lead to the discovery of admissible evidence in this case. I realize you disagree.

Please be advised that we will be filing a Motion for Protection Order and wanted you to be aware before incurring expenses for this deposition.

Sincerely yours,

  
Joseph L. Ackerman, Jr.

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