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[REDACTED]

September 30, 2014

Darren K. Indyke
Darren K. Indyke, PLLC
575 Lexington Avenue
4th Floor
New York, NY 10022

SENT VIA EMAIL
[REDACTED]

Re: Epstein v. Sitrick

Dear Darren:

Attached please find the case of Joannou v. Corsini. It is not directly on point, but it is close. The court certainly states that if jurisdiction of the person has been contested, the claimant cannot force discovery from the alleged judgment debtor.

I have also attached our Complaint to Stay Enforcement of Foreign Judgment for your ready reference. Clearly, we have contested in personam jurisdiction and as such, it is my opinion that we can successfully resist attempts to have discovery from JE unless and until there is a finding that the court does have in personam jurisdiction.

Please let me know if JE wishes to make an offer to see if this controversy will go away.

Very truly yours,



W. Chester Brewer, Jr.

WCB/cg
Attachment