

INADMISSABLE SETTLEMENT COMMUNICATION

October 15, 2012

VIA E-MAIL

Vincent S. Green, Esq.
NEMECEK COLE
15260 Ventura Boulevard, Suite 920
Sherman Oaks, California 91403-5344

Re: Sitrick and Company / Jeffrey Epstein

Dear Vince:

Your client's attempt to extract additional money from Mr. Epstein with threats to publicly disclose confidential information obtained in an indisputably privileged context is unproductive and ill-advised. For four weeks Mr. Epstein has been awaiting a response to his good faith offer to resolve the dispute with your client over approximately \$100,000 of claimed fees that Mr. Epstein never agreed to for services not previously specified to him. Even though no agreement was ever reached with Mr. Epstein, he has made a good faith offer to pay Mr. Sitrick's firm a substantial sum of \$25,000 to resolve this matter amicably. After a waiting a full month's time, your client refused to respond other than with your message setting an arbitrary five-day deadline for Mr. Epstein to offer to pay even more money if he does not want Mr. Sitrick's firm to file a complaint containing confidential information about Mr. Epstein.

Although it is quite clear that no agreement was ever reached with Mr. Epstein regarding the cost and the specifics of the services that were to have been provided by your client, it is equally clear that your client was engaged through Mr. Epstein's counsel, which gave rise to a duty on the part of Mr. Sitrick and his firm to maintain the confidentiality of the discussions and the information exchanged with Mr. Epstein's attorneys. Your client is now threatening to disclose in its complaint confidential information obtained by Mr. Sitrick in discussions with Mr. Epstein's attorneys, which is a most serious violation of Mr. Epstein's attorney-client and work-product privileges, as well as other rights of Mr. Epstein.

Frankly, it is astonishing to me that a public relations professional like Mr. Sitrick, whose reputation and perceived value are based largely on maintaining strict confidences, would even consider making public this sordid attempt to extract

money from a client by threatening to breach his confidences. I cannot imagine that Mr. Sitrick would want the public or the press to become aware of his shockingly unprofessional and improper behavior.

Nevertheless, if your client persists on this ill-advised course, then Mr. Sitrick should be prepared for full public disclosure of this shameful misconduct when Mr. Epstein pursues all of his remedies in this matter, including without limitation all appropriate equitable and monetary relief, against Mr. Sitrick and his firm. We hope this will not be necessary and that your client will provide a reasonable response to the offer Mr. Epstein made four weeks ago, but be advised that Mr. Epstein is prepared to proceed whichever way your client chooses.

Very truly yours,

Stephen G. Rinehart