

# TONJA HADDAD, PA

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May 11, 2012

**Via US and Electronic Mail**

Jack Scarola, Esq.  
Searcy Denney *et al.*  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Re: *Epstein v. Edwards et al.*

Dear Mr. Scarola:

We are in receipt of your purported responsive documents to Paragraph 13 of our Motion to Compel and have reviewed same. Please note that the request to which you were Court-ordered to respond required you to provide the following:

“All e-mails, data, correspondence, and similar documents dated April 1, 2008 through August 1, 2010 by and between Bradley J. Edwards, Scott W. Rothstein, Marc Nurik, Cara Holmes, Mike Fisten and any one of the following regarding or mentioning Jeffrey Epstein in any way: (a) the U.S. Attorney's Office, (b) the State Attorney's Office, (c) the Federal Bureau of Investigation, (d) Conchita Sarnoff, and (e) any other news employees or reporters.” *See Paragraph 13 of Motion to Compel.*

However, you provided little more than multiple copies of correspondence responsive to subparts (d) and (e). As such, please be advised that if we do not receive items responsive to the actual request; to wit: all e-mails, data, correspondence, and similar documents dated April 1, 2008 through August 1, 2010 by and between Bradley J. Edwards, Scott W. Rothstein, Marc Nurik, Cara Holmes, Mike Fisten and any one of the following regarding or mentioning Jeffrey Epstein in any way: (a) the U.S. Attorney's Office, (b) the State Attorney's Office, and (c) the Federal Bureau of Investigation on or before Monday, May 14, 2012, we will be left with no choice but to, yet again, file all appropriate motions with the Court and seek any and all sanctions available, including those to which you will be vulnerable for violation of a Court order.

Sincerely,  
TONJA HADDAD, PA

A handwritten signature in blue ink that reads "Tonja Haddad Coleman".

Tonja Haddad Coleman  
for the firm