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August 17, 2011

Lilly Sanchez
Fowler White Burnett, P.A.
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131

RE: Epstein v. Edwards

Lilly,

I am in receipt of your recent email to Mr. Epstein with copies to myself, Jay Lefkowitz, Roy Black and others at your firm dated Sunday August 14, 2011. Several assertions require a response.

First, I always understood that Mr. Epstein's primary litigation purpose in authorizing civil litigation against Mr. Edwards was to respond, in court, through a legal action approved by his experienced civil counsel, to what was perceived as improper, intrusive, and excessive legal and investigatory tactics employed by Mr. Edwards, his investigators, and others at the RRA firm that Mr. Epstein believed to be in furtherance of improper objectives other than relating to good faith representation of his three litigation clients. If you, or Chris, or Joe do not fully believe that this was and remains Mr. Epstein's litigation objective, I cannot continue to work with your firm, in even a limited supportive capacity.

Second, Mr. Epstein should not consider Mr. Scarola's threats against me in his decision-making as to how to proceed. My limited role in this civil case was to help Joe litigate the privilege issues. In late February or early March of 2011, I was asked to help Joe with litigation then pending before Judge Carney resulting from a subpoena issued for records that were part of a Bankruptcy proceeding before Judge Ray. I agreed to help Joe with the attorney-client privilege issues relating to these documents. My office sent Joe a legal memorandum regarding certain threshold issues and, as a result, we exchanged emails on March 8, 2011 in which I asked Joe to arrange for "my appearance...for limited purposes" to help him "litigate the privilege log issue" before Judge Carney on March 14 or 15,

2011. I neither drafted nor even reviewed (to my recollection) the Amended Complaint until after it was filed, nor was it within my limited role in this state civil case to research the merits or shortcomings of the cause of action chosen by your firm. Like Mr. Epstein, I relied on your firm's expertise in selecting a viable cause of action when I agreed to help Joe with the privilege litigation. I will not address whatever communications I had with Bob Critton at such times as he represented Mr. Epstein civilly. I will leave to Mr. Epstein a full response to your recommendations.

Sincerely,



Martin G. Weinberg

cc:

Joseph Ackerman (by E-Mail)

Christopher Knight (by E-Mail)