

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

March 29, 2010

VIA EMAIL AND US CERTIFIED MAIL RETURN RECEIPT REQUESTED

7008 1140 0004 7534 0750

Robert D. Critton, Jr.

BURMAN, CRITTON, et al.

303 Banyan Boulevard, Suite 400

West Palm Beach, FL 33401

Re: Epstein v. LM / Case Number 502009CA040800XXXXMBAG

Dear Mr. Critton:

Your claim against our client, L.M., is completely without merit, something you knew at the time this case was filed.

This letter serves as notice pursuant to F.S. § 57.105, that the Defendant L.M. will seek attorney's fees and sanctions against Jeffrey Epstein and his attorneys for bringing these unsupported claims.

Should you fail to dismiss your claims against L.M. within 21 days from this date, the attached Motion will be filed.

Very truly yours,

Gary M. Farmer, Jr.

GMF/bw

Enclosure as stated

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
[REDACTED] office 954.524.2822 fax

EFTA01110957

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendant.

MOTION PURSUANT TO F.S. §57.105

Defendant, L.M., moves this Honorable Court for the imposition of sanctions pursuant to the provisions of F.S. §57.105 on the basis that the Plaintiff and his counsel knew or reasonably should have known that the Plaintiff's claims against L.M., when initially presented to the court or subsequent thereto:

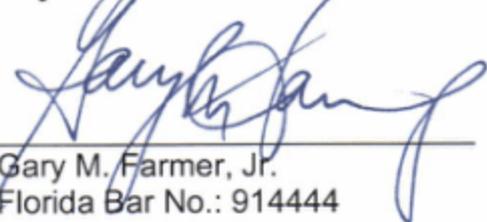
- a) were not supported by the material facts necessary to establish the claims and/or the defenses; or
- b) were not and would not be supported by the application of then existing law to those material facts.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail to all counsel on the attached list on March ____, 2010.

Gary M. Farmer, Jr.
**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, PL**
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301

██████████ fax
Attorneys for Defendant L.M.

By: 

Gary M. Farmer, Jr.
Florida Bar No.: 914444

COUNSEL LIST

Robert D. Critton, Jr., Esquire
Michael J. Pike, Esquire
Burman, Critton, Luttier & Coleman LLP
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401
Phone: (561)-842-2820
Fax: (561)-844-6929
Attorneys for Jeffrey Epstein

Jack Goldberger
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Jack Scarola
Searcy Denney Scarola Barnhart &
Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorneys for Defendant, Bradley
Edwards

Marc Nurik
Law Offices of Marc S. Nurik
One East Broward Boulevard, Suite 700
Fort Lauderdale, FL 33301
Phone: 954-745-5849
Fax: 954-745-3556
Counsel for Scott Rothstein