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TELEPHONE
TELEFAX

March 30, 2011

BY EMAIL

Harry P. Susman, Esq.
Susman Godfrey LLP
1000 Louisiana, Suite 5100
Houston, Texas 77002

Re: *Fortress VRF I LLC et al v. Jeepers Inc.*, JAMS No. 1425006537

Dear Harry:

I write regarding your clients' production of documents in the above-referenced matter. In our initial document request, we asked that your clients produce "All documents concerning Jeffrey Epstein's involvement in J.P. Morgan's investment in Highbridge Capital Management, including but not limited to the introduction of Glenn Dubin to Jes Staley." (Request No. 19.) In your response to this request, you refused to produce any documents, claiming that the request was "overly broad, vague, burdensome, designed to harass Respondents and/or third parties and not calculated to lead to the discovery of relevant information to the extent it seeks information not related to the Fund or the dispute at issue." After we asked you to reconsider your objection, you wrote in a March 11, 2011 email that "We intend to produce some documentation reflecting a fee that was paid in connection with [the] JP Morgan-Highbridge transaction. Other than that, I am informed by the Client that no other documents exist given that the transaction occurred back in 2004."

This response is not adequate. It is unclear from your email whether the documents you intend to produce comprise the entire universe of documents in your client's possession, custody or control concerning Mr. Epstein's involvement in J.P. Morgan's investment in Highbridge. We ask that you produce the documents described in your email as soon as possible, as well as any additional responsive documents your clients have.

In addition, your client is also obligated to ensure that Mr. Dubin searches for and produces documents in response to this request. Having submitted an affidavit in support of your clients' counterclaim and third-party claims, Mr. Dubin is under your clients' control for purposes of producing documents. Mr. Dubin may well have responsive documents in addition to those in your clients' possession, and we ask that you produce those documents as well.

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Harry P. Susman, Esq.

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Please let me know as soon as possible whether you will be producing the requested documents so that we can determine whether we need to raise these issues with the arbitrator.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Reynolds', written in a cursive style.

Daniel E. Reynolds

cc: William Schwartz, Esq.
Allan Arffa, Esq.