

LANKLER SIFFERT & WOHL LLP

ATTORNEYS AT LAW

33RD FLOOR
500 FIFTH AVENUE
NEW YORK, N. Y. 10110-3398
WWW.LSWLAW.COM

TELEPHONE
TELEFAX

March 30, 2011

BY EMAIL AND BY HAND

James H.R. Windels, Esq.
Davis Polk & Wardwell
450 Lexington Avenue
New York, NY 10022

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

Dear Jim:

I write regarding your clients' production of documents in the above-referenced matter. In our November 9, 2010 subpoenas, we requested that Glenn Dubin and Highbridge Capital Management produce "All documents concerning Jeffrey Epstein's involvement in J.P. Morgan's investment in Highbridge Capital Management," including but not limited to Mr. Dubin's introduction to Jes Staley. (Request No. 7.) Your clients refused to produce any documents in response to this request, claiming that the request was "overly broad, unduly burdensome, and seeks information that is irrelevant and not calculated to the discovery of admissible evidence."

Your clients' response is not acceptable. Mr. Dubin made himself a witness in this case by providing an affidavit to Jeffrey Epstein in this arbitration. We are entitled to explore Mr. Epstein's role in facilitating J.P. Morgan's investment in Highbridge because it goes directly to Mr. Dubin's bias as an affiant and witness in this case.

If you do not produce all documents responsive to Request No. 7 by next Wednesday, we will take all appropriate steps to enforce the subpoenas.

Very truly yours,



Daniel E. Reynolds

cc: Harry Susman, Esq. (by email)
William Schwartz, Esq. (by email)
Allan Arrfa, Esq. (by email)