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Spanish

VIA EMAIL and U.S. Mail

September 12, 2012

Fred Haddad, Esquire
One Financial Plaza, Suite 2612
Fort Lauderdale, FL 33394

Re: Edwards adv. Epstein

Dear Fred:

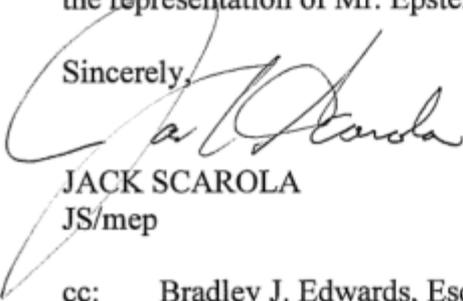
Brad Edwards has reminded me of your representation of Russ Adler in matters directly relating to many of the same issues presently in contention in the pending litigation against Jeffrey Epstein. Indeed, when Russ was deposed in our case, you appeared on his behalf, obviously supporting his position that neither he nor Brad was a knowing participant in the Rothstein Ponzi scheme.

As counsel to Adler you had complete access to all of the RRA files relating to Brad's prosecution of the civil claims against Epstein including all attorney work-product and attorney-client privileged communications. Those are documents as to which we have asserted and continue to assert all applicable privilege objections.

It certainly appears that these circumstances place you in an untenable conflict position, and since the privileges involved include privileges that belong to Brad's clients and to the former clients of RRA and Russ Adler, this is a conflict that Brad cannot waive.

While we would otherwise welcome your appearance as a presumed voice of reason on the opposite side of this case, we must and do object to any participation by you in the representation of Mr. Epstein. Please notice your immediate withdrawal.

Sincerely,


JACK SCAROLA
JS/mep

cc: Bradley J. Edwards, Esq.

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