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VIA EMAIL ONLY

November 10, 2015

Joe Titone, Esquire

Re: Edwards, Bradley vs. Dershowitz  
Our File No.: 20150013

Dear Mr. Titone:

I understand that you represent Jean Luc Brunel and further that he wishes to clear his name. We are currently prosecuting cases in which his testimony would be helpful, for him and us. We are requesting your assistance in voluntarily producing Mr. Brunel for deposition, and in exchange we will agree to take his deposition wherever would be most convenient for him. It is imperative that we get dates before the end of this year. When you speak with your client, please get several dates so that we can confirm a date with all parties.

Lastly, while we understand his truthful testimony will be highly relevant to our actions as well as beneficial to Mr. Brunel, before we agree to travel in an effort to accommodate him, we ask that you obtain from Mr. Brunel and transmit to me a summary-type statement detailing some of his anticipated testimony. Particularly, we need him to explain the role, if any, Alan Dershowitz and Ghislaine Maxwell played in either witnessing or participating in the sexual exploitation of minors.

I look forward to your prompt reply.

Sincerely,

Dictated But Not Signed By  
Jack Scarola To Expedite Delivery

JACK SCAROLA  
JS/mep

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