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February 5, 2013

Via US and Electronic Mail

Jack Scarola, Esq.
Searcy Denney *et al.*
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

Re: *Epstein v. Edwards et al.*

Mr. Scarola:

Please provide dates within the next ten (10) days upon which we may appear at Mr. Edwards's office and copy and inspect all items as delineated by you in your Response to Mr. Epstein's Second Request to Produce dated December 9, 2011; to wit: items responsive to Requests Number 5, 8, and 9. Copies of the Requests and your Responses are attached hereto for your review.

Additionally, in your response to Plaintiff's Third Set of Interrogatories to Mr. Edwards, also dated December 9, 2011, you responded to Question 4 by stating that Steve Jaffe, Gary Farmer, Seth Lehrman, Former Federal Judge Paul Cassell, and Earleen Cote are all witness whom have knowledge of the damages allegedly suffered by Mr. Edwards that he seeks to recover in this action. As such, please provide several dates upon which you are available in February and early March upon which we may set these depositions. A copy of the Interrogatories and your Responses thereto are likewise attached for your review. We are willing to accommodate Mr. Edwards's former boss and his current partners by setting the depositions at their respective offices should that make it more convenient for them.

Finally, we wish to set the continuation of Mr. Edwards's deposition within the next month, so please provide dates upon which you are available for same. Thank you.

Sincerely,
TONJA HADDAD, PA



Tonja Haddad Coleman
for the firm

cc: Parties on Service List