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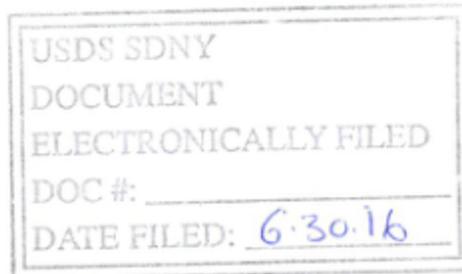
OF COUNSEL  
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MEMO ENDORSED

June 29, 2016

**Via E-mail**

Hon. Richard J. Sullivan, D.J.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2104  
New York, New York 10007  
([SullivanNYSDChambers@nysd.uscourts.gov](mailto:SullivanNYSDChambers@nysd.uscourts.gov))



**Re: Steven Jude Hoffenberg v. Jeffrey E. Epstein, et al. (Index No. 1:16-cv-03989)**

Dear Judge Sullivan:

Reference is made to the Defendants' letter to the Court (the "Defendants' Letter") which was filed yesterday, June 28, 2016, via the Electronic Case Filing system for the Southern District of New York. We totally disagree with the facts and conclusions which were raised in the Defendants' Letter.

To properly resolve the issues raised in the Defendants' Letter, we believe that it is necessary to evaluate the long history between Mr. Jeffrey E. Epstein and Mr. Steven J. Hoffenberg and their involvement in Towers Financial Corporations' ("TFC") Ponzi fraud, which includes many fraudulent securities offerings of promissory notes and bonds by TFC, (the

“TFC Ponzi Fraud”). It is Mr. Hoffenberg’s position that Mr. Epstein’s fraudulent actions and engagement in the TFC Ponzi Fraud with Mr. Hoffenberg and TFC resulted in over 200,000 victims and damages of over one billion (\$1,000,000,000) dollars directly or indirectly from the purchase of fraudulent securities consisting of promissory notes and bonds from TFC, (the “TFC Victims”) and from Mr. Epstein’s original and subsequent actions.

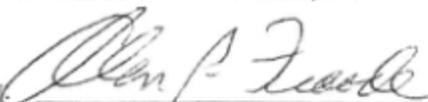
Moreover, the Defendants’ Letter raises several issues which demand joining the TFC Victims in this litigation as co-plaintiffs with Mr. Hoffenberg.

Councilman George Cushingberry, Jr., Esq., for the City of Detroit, who was the Chairman of the Appropriations Committee for the City of Detroit until 2010, originally introduced Mr. Hoffenberg to the Retirement System City of Detroit, which is now one of the TFC Victims. Mr. Hoffenberg has been in constant communications with Councilman Cushingberry, Jr., Esq.’s Legislative Aide, and friend of Mr. Hoffenberg, Mr David Cavanagh, who recently advised Mr. Hoffenberg that the Retirement System City of Detroit may join this pending lawsuit before this Court to recover over one hundred twenty-five million (\$125,000,000) dollars in damages from Mr. Epstein for his fraudulent actions pursuant to the TFC Ponzi Fraud set forth in the Complaint.

In view of the upcoming Fourth of July holiday weekend, we respectfully request additional time until July 12, 2016, to respond to the Defendants' Letter in further detail with respect to this matter in order to ensure that the interests of the TFC Victims are protected.

Respectfully submitted,

The Mintz Fraade Law Firm, PC

By 

Alan P. Fraade

Plaintiff's request is denied. As required under Rule 2.A. of the Court's Individual Practices, IT IS HEREBY ORDERED THAT Plaintiff shall submit a response to Defendants' pre-motion letter by July 1, 2016. IT IS FURTHER ORDERED THAT the initial conference scheduled for July 15, 2016 at 10 a.m. shall also serve as a pre-motion conference on Defendants' contemplated motion to dismiss.

SO ORDERED

Dated:

6/30/16

  
RICHARD J. SULLIVAN  
U.S.D.J.

APF/llk

Cc: Gary H. Baise, Esq.  
Mr. Steven Hoffenberg  
Bennet J. Moskowitz, Esq.