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 **DRAFT 3**

August 18, 2015

**NOT TO BE SHARED WITH ADVERSE PARTY**

VIA E-MAIL ONLY ron@ [REDACTED]

The Honorable Ronald V. Alvarez  
Matrix Mediation, LLC  
1655 Palm Beach Lakes Blvd., Suite 700  
West Palm Beach, FL 33401

**Re: Jeffrey Epstein vs. Scott Rothstein and Bradley J. Edwards  
15th Judicial Circuit Case No. 502009CA040800XXXXMB - Div AG (Hafele)  
MEDIATION: Tuesday - September 1, 2015 at 2:00 p.m. (at your office)**

Dear Ron:

The above-referenced matter is scheduled for Mediation with you on Tuesday - **September 1, 2015 at 2:00 p.m.** The Mediation is to take place at Matrix's offices.

Some time ago, Judge Hafele granted Jeffrey Epstein's Motion for Summary Judgment. Well prior to the filing of that Summary Judgment Motion, a proposal for settlement in the amount of \$300,000 had been made by Mr. Epstein to Mr. Edwards. Later, Judge Hafele ruled that Mr. Epstein was entitled to attorneys' fees based on the Proposal for Settlement. We are, thus, discussing attorneys' fees for the period of time between the effective date of the Proposal for Settlement and the Court's Order regarding entitlement.

At the Mediation, we will have available attorneys' time records for the applicable period, along with a listing of all claimed taxable costs. The attorneys' fees and costs are north of \$1 million.

The issue at hand is the amount of reasonable attorneys' fees to be awarded by Judge Hafele, along with taxable costs. Despite Mr. Scarola's insistence that no complete resolution as to attorneys' fees and costs will be obtained through Mediation, Judge Hafele has ordered that the parties mediate and come to an agreement on as many issues related to attorneys' fees and taxable costs as possible. I have attached a copy of the transcript of a hearing in which Judge Hafele describes (quite forcefully) what he wishes the Mediation to accomplish.

It is anticipated that Mr. Scarola will wish to discuss a "global settlement" and demand that Mr. Epstein write Mr. Edwards a check for millions of dollars. The Court's ruling on the Motion for Summary Judgment is on appeal to the 4th District Court of Appeal, and should the 4th District Court of Appeal rule against the granting of Summary Judgment, it is anticipated that the issue on appeal which has already been submitted to the Supreme Court of Florida for review in

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another 4th District case, may be decided by the Supreme Court of Florida. Given earlier rulings by the supreme court, we are confident that the supreme court will rule in favor of Mr. Epstein. We would therefore appreciate it if you would limit Mr. Scarola and Mr. Edwards to a discussion of the issues of fees and costs at hand. Should Mr. Scarola persist in his demand for monies, the Mediation will quickly reach an impasse.

If you have any questions, please do not hesitate to give me a call.

Respectfully submitted,

W. CHESTER BREWER, JR., ESQUIRE

WCB/ch

Enclosure (Transcript of 5/20/15 Hearing on disclosure of time records)