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July 12, 2013

**BY EMAIL** ([ceciledejongh@yahoo.com](mailto:ceciledejongh@yahoo.com))

Ms. Cecile de Jongh  
c/o Jeffrey Epstein  
6100 Red Hook Quarter, Suite B-3  
St. Thomas, USVI 00802

Re: *IGY-AYH St. Thomas Holdings, LLC – and – Island Global Yachting Facilities Ltd. – and Jeffrey Epstein*

Dear Cecile:

This letter is in furtherance of our conversation of this morning concerning the proposed way forward in seeking to resolve all pending disputes between IGY – AYH St. Thomas Holdings, LLC and Island Global Yachting Facilities Ltd. and their affiliates on the one hand, and Jeffrey Epstein and his affiliates on the other.

We have proposed to mediate our disputes, with each side splitting the costs of the mediator and otherwise bearing their own costs incident to the mediation.

The mediation will be conducted in New York City under the auspices of JAMS, an internationally recognized provider of mediation services (see [www.jamsadr.com](http://www.jamsadr.com)).

We propose the following three mediators for your consideration. We do so based upon their expertise and record in resolving disputes. They are:

- David Geronemus;
- Michael D. Young; and