

**EXHIBIT**

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**PROPOSED JOINT LETTER TO THE SPECIAL MASTER**

**Re: Special Master: Privileged and Confidential**

Dear Sir:

The undersigned, as counsel for the United States of America and Jeffrey Epstein, jointly write to you to provide information relevant to your service as a Special Master in the selection of an attorney to represent several young women who may have civil damages claims against Mr. Epstein.

The U.S. Attorney's Office and the Federal Bureau of Investigation (jointly referred to as the "United States") have conducted an investigation of Jeffrey Epstein regarding his solicitation of minor females in Palm Beach County to engage in prostitution. Mr. Epstein, through his assistants, would recruit underage females to travel to his home in Palm Beach to engage in lewd conduct in exchange for money. Based upon the investigation, the United States has identified 40 young women who can be characterized as victims pursuant to 18 U.S.C. § 2255. Some of those women went to Mr. Epstein's home only once, some went there as much as 100 times or more. Some of the women's conduct was limited to performing a topless or nude massage while Mr. Epstein masturbated himself. For other women, the conduct escalated to full sexual intercourse.

As part of the resolution of the case, Mr. Epstein agreed that he would not contest jurisdiction in the Southern District of Florida for any victim who chose to sue him for damages pursuant to 18 U.S.C. § 2255. Mr. Epstein agreed to provide an attorney for victims who elected to proceed exclusively pursuant to that section, and agreed to waive any challenge to liability under that section up to an amount agreed to by the parties.

The parties have agreed to submit the selection of an attorney to a Special Master. Attached hereto is a list of five attorneys whom the parties have agreed should be considered by the Special Master for selection. Also attached hereto is a memorandum explaining the anticipated duties and responsibilities of the attorney who is selected, and that portion of the agreement between the United States and Mr. Epstein addressing the attorney's role. Each attorney has provided some background information regarding his or her practice, experience, and other relevant factors. The Special Master may contact any or all of those attorneys for additional information, as the Special Master deems appropriate. Each party will also provide the Special Master with a list of the criteria that the party believes should be considered in making the selection. If the Special Master has any questions regarding the criteria, he may contact the relevant party to inquire further, as he deems appropriate.

The parties ask that the Special Master "rank" the top three attorneys, in case one or more has a conflict that prevents him or her from accepting the representation.

The parties thank you for your willingness to conduct this task as a *pro bono publico* matter. Please do not hesitate to contact us if you need any further information.