

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

October 28, 2010

Christopher E. Knight
Fowler White Burnett PA
Espirito Santo Plaza
Fourteen Floor
1395 Brickell Avenue
Miami, FL 33131-3302

Re: Withholding of Discoverable Materials in Jane Doe v. Epstein

Dear Mr. Knight:

I am writing on an urgent matter. I was recently informed that there are substantial materials that were not produced during discovery in the *Jane Doe v. Epstein* case, No. 9:08-CV-80893 (S.D. Fla.). I am writing to alert you to my concerns and to see if you have any explanation.

As you know, in 2009 Jane Doe propounded (among others) three discovery requests to Epstein:

Request No. 7: All discovery information obtained by you or your attorneys as a result of the exchange of discovery in the *State* criminal case against you or the Federal investigation against you.

Request No. 9: Any documents or other evidentiary materials provided to local, *state*, or federal law enforcement investigators or local, *state* or federal prosecutors investigating your sexual activities with minors.

Request No. 10: All correspondence *between you and your attorneys* and state or federal law enforcement or prosecutors (includes, but not limited to, letters to and from the *States Attorney's* office or any agents thereof).

On June 30, 2010, after innumerable motions and continuances and delays, I finally received information responsive to that request by e-mail, totaling approximately 359 pages. Three of my clients settled their cases against Epstein shortly after receiving that information, believing that this was all the information that was subject to the discovery request (and also having filed a motion regarding redactions made in the materials and the absence of materials concerning correspondence with *state* prosecutors).

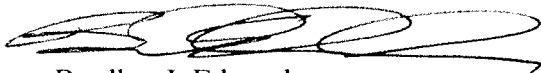
Yesterday, I received a report from a reliable source that there was substantial additional correspondence between Epstein's attorneys and federal prosecutors – information clearly covered by the discovery requests that was not produced. In particular, I was informed that there exists email correspondence between Matthew Menchel who was working at the United States Attorney's Office and Lilly Ann Sanchez, an Epstein attorney. Additionally, I was told that there exists a significant amount of correspondence between the United States Attorney's Office and/or other components of the Justice Department and Ken Starr, another Epstein attorney.

I am writing to ask you whether the report I received is correct and, if so, why this information was not produced. My clients made significant financial decisions based, in part, on the fact that Epstein was not concealing other information responsive to discovery requests. Accordingly, they may have been seriously harmed if the report is correct. Before we proceed on this information that appears to be a clear obstruction of justice committed by Epstein and most likely several of his attorneys we wanted to hear your side of this story. If that correspondence was not turned over *inadvertently* then you have an ethical obligation to inform the Court of your client's *mistake* and to provide my office with the additional discovery to allow for my office to review those materials and determine whether my client was prejudiced by your client's failure to respond completely to our discovery requests and the Court's Order that compelled that production.

Thank you in advance for your prompt response to this letter.

Very truly yours,

FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

A handwritten signature in black ink, appearing to read 'Bradley J. Edwards', with a stylized, flowing script.

Bradley J. Edwards
BJE:mwk