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April 13, 2011

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BY EMAIL

Hon. Anthony J. Carpinello (Ret.)
Arbitrator, JAMS
620 Eighth Avenue, 34th Floor
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VRF I LLC v. Jeepers, Inc., JAMS Ref. No. 1425006537

Dear Judge Carpinello:

On behalf of Claimants VRF I LLC and Fortress Value Recovery Fund I LLC (together, "Claimants"), we write to seek an order compelling Respondents Financial Trust Company, Inc. and Jeepers, Inc. (together, "Jeepers/FTC") to produce certain documents in response to our First Set of Document Requests, dated August 17, 2010. The requested documents would reveal (1) the organizational structure of Jeepers and FTC; (2) the relationships among Jeepers, FTC, Jeffrey Epstein, and any partner, member, beneficial owner of, or other direct or indirect economic participant in, FTC or Jeepers or FTC's or Jeepers's investments in the Fund; as well as (3) any communications among those parties relevant to this matter.

As discussed further below, Claimants believe that the documents at issue are highly relevant, and Jeepers/FTC have failed to articulate any reason why such documents should not be produced in this Arbitration. The parties have exchanged several emails to try to resolve this matter, but have been unable to do so. We therefore seek an order compelling Jeepers/FTC to produce the documents at issue in advance of the first deposition in this matter on April 20, 2011.