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October 15, 2020

**FOR SETTLEMENT PURPOSES ONLY  
NOT ADMISSIBLE IN EVIDENCE**

Douglas A. Wyler  
Jacob Scholz & Wyler, LLC  
961687 Gateway Blvd.  
Suite 201-I  
Fernandina Beach, FL 32034  
[Jacobsscholzlaw@comcast.net](mailto:Jacobsscholzlaw@comcast.net)

Re: *CA Holdings, Inc. as Publisher of The Palm Beach Post v. Dave Aronberg, as State Attorney et al.*  
Case No. 2019-CA-014681

Dear Mr. Wyler:

In candor, I was disappointed to receive your telephone call today, and write to advise that my client will not accept the counter-offer proposed by the State's Attorney.

Nevertheless, as we discussed previously this morning, and as I mentioned to the Court during the case management conference, *The Palm Beach Post* ("The Post") was pleased to read the State Attorney's clear and unequivocal statement in its Response filed yesterday that his office will not oppose *The Post's* request for access to the Jeffrey Epstein grand jury materials.

I therefore hereby reiterate my client's initial settlement offer: in exchange for *The Post* dropping the State Attorney from the above case, pursuant to Fla. R. Civ. P. Rules 1.250 and 1.420(1)(B), the State Attorney will withdraw all of his pending motions. The dismissal of the case will be with prejudice. The parties will file a brief stipulation with the Court stating that they have settled their litigation based on these terms as well as the State Attorney's representation that it will not take a position against *The Post's* constitutional and statutory claims for public access to the Jeffrey Epstein grand jury materials.

**Greenberg Traurig, P.A. | Attorneys at Law**

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Party JOINT

J.C. West Palm Beach, Westchester County.

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ID# J22 EV# J22  
DATE ADMITTED: 9/6/2022

Case No. 2019-CA-014681

**Joint Exhibit**

**J22**

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Resolving the case makes sense for both parties. We urge the State Attorney to consent and for the parties to enter into the stipulation as set forth herein.

Thank you for your cooperation.

Very truly yours,

*/s/Stephen Mendelsohn*

Stephen Mendelsohn

SAM:ls

cc: Michael Grygiel, Esq.  
Nina Boyajian, Esq.

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