

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CIVIL DIVISION AG

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually, and
BRADLEY J. EDWARDS, individually,

Defendants.

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DEC 13 2011
SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
RESPONSE TO BRADLEY J. EDWARDS' REQUEST TO PRODUCE**

Plaintiff/Counter-Defendant, JEFFREY EPSTEIN ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, hereby files his Responses and Objections to Defendants/Counter-Plaintiffs' Request to Produce to Jeffrey Epstein dated October 28, 2011 and in support states as follows:

Request No. 1: All contracts for legal services rendered in defense of the criminal charges and civil claims prosecuted against you arising out of allegations involving your misconduct with minor females.

Answer:

If there is a contract for legal services relating to the damages claimed by Mr. Epstein in his Second Amended Complaint, it will be produced. Plaintiff objects to producing any and all other contracts for legal services in the defense of criminal charges or other civil claims against

Mr. Epstein not related to the claims in the Second Amended Complaint as being irrelevant, overbroad, and privileged as attorney-client and work product.

Request No. 2.: All invoices for legal services rendered in connection with the referenced matters.

Answer:

The invoices for legal services relating to the damages claimed by Mr. Epstein in his Second Amended Complaint will be produced. Plaintiff objects to producing any and all other invoices for legal services in the defense of criminal charges or other civil claims against Mr. Epstein not related to the claims in the Second Amended Complaint as being irrelevant, overbroad, and privileged as attorney-client and work product.

Request No. 3.: All statements for costs incurred in connection with the referenced matters.

Answer:

The statements for costs incurred in connection to the damages claimed by Mr. Epstein in his Second Amended Complaint will be produced. Plaintiff objects to producing any and all other statements for costs incurred in connection with the defense of criminal charges or other civil claims against Mr. Epstein not related to the claims in the Second Amended Complaint as being irrelevant, overbroad, and privileged as attorney-client and work product.

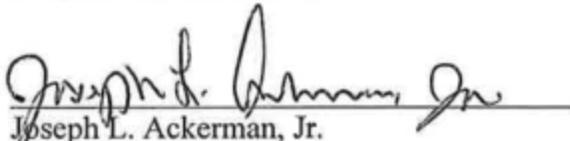
Request No. 4.: All documents reflecting and/or relating to the payment for services and costs incurred in connection with the referenced matters.

Answer:

The documents reflecting and/or relating to the payment for services and costs incurred in connection with the damages claimed by Mr. Epstein in his Second Amended Complaint will be produced. Plaintiff objects to producing any and all other documents reflecting and/or relating to the payment for services and costs incurred in connection with the defense of criminal charges or other civil claims against Mr. Epstein not related to the claims in the Second Amended Complaint as being irrelevant, overbroad, and privileged as attorney-client and work product.

Dated: December 12, 2011.

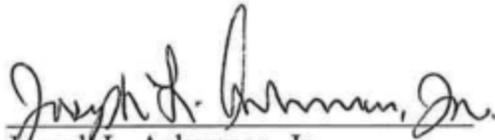
Respectfully submitted,



Joseph L. Ackerman, Jr.
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Attorneys for Plaintiff Jeffrey Epstein

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail on this 12th day of December, 2011 to: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, [REDACTED], 2139 Palm Beach Lakes Blvd., West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, [REDACTED], 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.

By: 
Joseph L. Ackerman, Jr.