

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

**DEFENDANT/COUNTER-PLAINTIFF, BRADLEY J. EDWARDS, RESPONSE IN
OPPOSITION TO JEFFERY EPSTEIN'S MOTION FOR A PROTECTIVE ORDER
RELATING TO HIS DEPOSITION AND IN SUPPORT OF EDWARDS' MOTINO TO
COMPEL AND IMPOSE SANCTIONS**

Defendant/Counterplaintiff, Bradley J. Edwards (hereinafter EDWARDS), by and through his undersigned attorneys, respectfully responds in opposition to Plaintiff/Counterdefendant, Jeffrey Epstein's (hereinafter EPSTEIN) motion for a protective order and to terminate his deposition. The motion is frivolous and should be denied.

EPSTEIN has filed a Complaint against EDWARDS that alleges that EDWARDS filed lawsuits making "unfounded . . . sexual allegations" and pleading "a cause of action for RICO when there was no good faith basis for doing so." EPSTEIN's Complaint further alleges that much of the discovery EDWARDS took in support of these lawsuits "had no legitimate purpose." In prior filings with this Court, EDWARDS has painstakingly detailed under oath the good faith basis for every claim he brought and every step he took in the prosecution of those claims. In defense of the lawsuit against him, EDWARDS is now obviously entitled to ask

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EPSTEIN whether the lawsuits were, far from being "unfounded," in fact entirely well-founded and whether there was, in fact, a "good faith basis" for a RICO claim. EDWARDS is now obviously allowed to explore the legitimate purposes underlying his discovery in those cases – specifically, whether his discovery efforts were reasonably calculated to lead to admissible evidence by showing that he, in fact, would have uncovered admissible evidence through those discovery efforts had his cases not been voluntarily settled by EPSTEIN. Accordingly, EPSTEIN's baseless motion should be denied and EPSTEIN should be directed to begin to answer relevant questions about both the lawsuit that he chose to file and prosecute against EDWARDS and the pending, closely related counterclaims.

FACTUAL BACKGROUND

Plaintiff/Counterdefendant, EPSTEIN has filed a Second Amended Complaint against EDWARDS. The complaint challenges EDWARDS' professionalism as an attorney representing girls who had been sexually abused.

In particular, the Complaint charges EDWARDS with "making unfounded and highly charged sexual allegations" in the lawsuits he and his co-counsel filed on behalf of clients. Second Amended Complaint at 2 (emphasis added). The Complaint specifically advances an "abuse of process" claim against EDWARDS, namely that EDWARDS "made illegal, improper, and perverted use of the civil process" by doing such things as "filing a state court action on behalf of L.M. against [EPSTEIN] seeking damages" (§ 30). EPSTEIN goes on to allege that "EDWARDS knew or should have known that highly-charged sexual allegations in [his] complaint that EPSTEIN forced L.M. to have 'oral sex' with him were false" (§ 30(b)).

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EPSTEIN also contends that EDWARDS "made illegal, improper and perverted use of the civil process" by conducting "unreasonable and unnecessary 'discovery,' [and] making unfounded allegations" (§ 32)). Among the improper discovery EPSTEIN alleges that EDWARDS engaged in without "legitimate purpose" was asking three of EPSTEIN's jet pilots about sexual activities on EPSTEIN's aircraft (§ 32(1)); sending letters asking for deposition dates for the deposition of TV personality Donald Trump, law professor Alan Dershowitz, magician David Copperfield, and other individuals who were without any knowledge of relevant evidence about EPSTEIN's sex offenses (§ 32(2)); subpoenaing EPSTEIN's sex therapist (§ 32(5)); attempting to plead a civil RICO action against EPSTEIN for organizing a criminal enterprise bringing young girls to EPSTEIN to molest "when there was no good faith basis for doing so" (§ 32(9)); and filing without sufficient evidence a motion alleging EPSTEIN was going to transfer assets outside the country to avoid paying damages to his sexual assault victims (§ 32(10)).

In response to EPSTEIN's Complaint, EDWARDS has filed a Second Amended Counterclaim against EPSTEIN. The counterclaim alleges (among many other things) that "[lacking any substantive defense to the claims against him, EPSTEIN sought to avoid his compensatory and punitive liability and to deter cooperation in the ongoing criminal investigation [of EPSTEIN's sex offenses] by employing the extraordinary financial resources at his disposal to intimidate his [sexual assault] victims and their legal counsel into abandoning their legitimate claims or resolving those claims for substantially less than their just value" (Counterclaim ¶ 6). The counterclaim specifically alleges an abuse of process claim, namely

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that "every motion [made by EPSTEIN], every request for production, every subpoena issued, and every deposition taken . . . was intended with respect to EDWARDS solely and exclusively to advance EPSTEIN's efforts at extortion . . ." (Counterclaim ¶ 16). The counterclaim also raises a malicious prosecution claim, alleging that EPSTEIN's entire Complaint against EDWARDS was "false and unsupported by any reasonable belief or suspicion that [its allegations] were true" (Counterclaim ¶ 29).

On January 25, 2012, EDWARDS' attorney began taking EPSTEIN's deposition. (A copy of the transcript of the deposition is attached as Exhibit "A"). EPSTEIN answered a question about his name. EPSTEIN answered a question about his addresses. Then EPSTEIN, in typical EPSTEIN fashion, proceeded to give essentially no information in answers to many other questions asked of him. Among the relevant questions that EPSTEIN refused to answer were:

- Do you now or have you ever had a sexual preference for minors? (p. 6)
- Have you ever discussed your sex-related arrest or conviction with any reporter or news media representative? (p. 12)
- Have you ever discussed your sex-related activities with minors in the State of Florida with any reporter or news media representative? (p. 13)
- Do you know who LM is? (p. 21).

Although he had answered very few questions – and even though he is the Plaintiff who chose to enter the legal system by filing his Complaint – EPSTEIN then terminated his deposition, purportedly to get further "direction" from the Court. EDWARDS' counsel then stated:

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So that the record is clear, it is my intention to ask very specific questions about every factual allegation included in every claim brought by Mr. Edwards on behalf of every victim in every case in which it is alleged that Mr. Edwards has abusively prosecuted that claim. I want to know about the connection between Mr. Epstein and each one of those alleged victims. I want to know about every individual who had information concerning the events that are alleged in those complaints, every individual who was in a position to have possibly had information about the events alleged in those complaints. I want to ask this witness about every person whose deposition was taken and scheduled to be taken, the relationship of those persons to Mr. Epstein, knowledge that those persons may have with respect to Mr. Epstein's activities with minors, other crimes committed by Mr. Epstein as part of an ongoing and continuous course of conduct supportive of claims for punitive damages against Mr. Epstein and supportive of RICO claims against him. And had this deposition been permitted to continue, we would have covered each of those areas and substantially more.

DISCUSSION

I. EDWARDS Is Entitled to Take Broad Discovery In Deposing EPSTEIN.

Before turning to the specific questions that EDWARDS is entitled to ask of EPSTEIN, it is important to review the current procedural posture of this case. EPSTEIN has chosen to invoke the legal system by filing a Complaint against attorney EDWARDS. Accordingly, just like any other civil plaintiff, EPSTEIN must answer questions about his case or suffer the consequences of the application of the well-established "sword-shield doctrine"—the dismissal of his claims.

Under the Florida rules, EDWARDS is entitled to ask any and all questions reasonably calculated to lead to the discovery of admissible evidence. Considering the substance of the claims EPSTEIN is making against EDWARDS in his totally bogus lawsuit that all relate to discovery that was conducted by EDWARDS in the sexual molestation claims against EPSTEIN,

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the questions asked by EDWARDS' counsel in the deposition of EPSTEIN would likely result in direct admissible evidence – far exceeding the liberal threshold of reasonably calculated to lead to the discovery of admissible evidence.

II. EDWARDS Is Entitled to Ask EPSTEIN Questions About Whether the Clients' Claims Against EPSTEIN Were "Well-Founded."

Remarkably, EPSTEIN takes the position that he can file a lawsuit against EDWARDS alleging that EDWARDS improperly filed "unfounded" sexual abuse claims (Second Amended Complaint at 2) but then he need not answer any questions about whether the abuse claims were, indeed, well-founded! His position is absolutely absurd. Once EPSTEIN filed an "abuse of process" claim against EDWARDS – for example, that EDWARDS "made illegal, improper, and perverted use of the civil process" by doing such things as "filing a state court action on behalf of L.M. against [EPSTEIN] seeking damages" (§ 30) – EDWARDS was entitled to depose EPSTEIN about those issues. It was entirely proper, for instance, for EDWARDS to ask about why EPSTEIN considers L.M.'s sexual abuse law suits to be somehow "improper." Of course, if EPSTEIN sexually abused L.M., there would be nothing "improper" about an attorney filing a sexual abuse claim against EPSTEIN. Indeed, an attorney with an obligation to zealously represent his clients would be neglecting his duties if he did anything other than file such a claim.

EPSTEIN's motion for a protective order claims that these questions had no other purpose than to be somehow "sexually harassing." Motion for a Protective Order at 4. But the motion itself demonstrates the absurdity of EPSTEIN's position. EPSTEIN's Motion for a

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Protective Order describes Epstein's lawsuit as involving a claim that "EDWARDS filed the federal case of L.M. v. EPSTEIN . . . with 145 counts and knew . . . that the highly-charged sexual allegations were false . . ." Id. at 2 (emphasis added). This claim against EDWARDS obviously means that EDWARDS is able to ask EPSTEIN whether each and every one of these 145 counts were or were not "false" – i.e., whether EPSTEIN sexually abused L.M. on 145 specifically identified dates. That is precisely what EDWARDS was in the process of beginning to do in EPSTEIN's deposition . . . at least before EPSTEIN walked out.

In his pleading, EPSTEIN appears to exhibit some squeamishness about sexual matters, claiming that "questions related to sexual conduct and criminal misconduct are not (and were not) designed to, and would not, provide any information relevant to the" case. Motion for Protective Order at 5. But EPSTEIN's complaint directly and repeatedly belies the idea that this case should be litigated without sexual activities being discussed. Apparently EPSTEIN believes he should be allowed to file a complaint making all kinds of false allegations about EDWARDS and the discovery EDWARDS conducted in the various sexual abuse cases brought on behalf of several of EPSTEIN's child victims, yet have the court hand-cuff EDWARDS so as to not permit EDWARDS to disprove those false allegations made by EPSTEIN nor allow EDWARDS to prove the valid allegations outlined in his counter-claim. While that may be what would work best for EPSTEIN, that is simply not at all how our system works.

Nor does it make any difference, as EPSTEIN seems to suggest, that he might choose to invoke the Fifth Amendment rather than provide direct answers to some of these questions. It is not harassment to ask relevant questions, which a plaintiff in a civil case then refuses to answer.

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To the contrary, the plaintiff's answers can be used against him through adverse inferences. See, e.g., *In re J.E.B.*, 971 So.2d 187, 188 (Fla.App. 2 Dist. 2007) (citing *Baxter v. Palmigiano*, 425 U.S. 308 (1976) (“[T]he Fifth Amendment does not forbid adverse inferences against parties to civil actions when they refuse to testify in response to probative evidence offered against them[.]”). For all these reasons, EPSTEIN's motion for a protective order to prevent EDWARDS from asking questions about whether the sexual assault cases against him were well-founded should be denied.

III. EDWARDS Is Entitled to Ask Questions About Whether There Was a Basis for His Client's RICO Claims Against EPSTEIN.

As a separate and independent reason for completely rejecting EPSTEIN's motion for a protective order, EDWARDS was entitled to ask EPSTEIN questions about his clients' RICO claims against EDWARDS. EPSTEIN's complaint against EDWARDS alleges that “EDWARDS filed motions in the EPSTEIN Actions attempting to plead a cause of action for RICO [Racketeering Influenced and Corrupt Organizations] when there was no good faith basis for doing so.” Second Amended Complaint at 32(9). EDWARDS is accordingly entitled to ask questions about whether there was a “basis” for the RICO claims against EPSTEIN.

A bit of background about the complaints and the RICO claims may be useful. For each of his three clients, EDWARDS filed complaints alleging basic sexual assault claims, such as sexual battery in violation of Florida Statutes §800.04 and procuring a minor for prostitution in

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violation of Florida Statutes § 796.03. Such claims involve single acts of sexual abuse directed against EDWARDS' clients.

EDWARDS, however, went further than allege just simple, isolated acts of sexual abuse by EPSTEIN. Instead, EDWARDS filed detailed RICO claims under, as appropriate, state and federal law. These RICO claims alleged that it was no accident that young girls like his clients L.M., E.W. and Jane Doe ended up in EPSTEIN's mansion where he sexually abused them. Instead, the RICO claims contended that EPSTEIN ran an entire criminal organization that was designed to satisfy his sexual appetite for attractive young (white) girls under the age of eighteen. The organization operated as follows:

The enterprise was not a mere informal conspiracy, but had a definite hierarchical structure. Defendant, Jeffrey Epstein, served informally but effectively as the leader, C.E.O. or "boss" of this organization, directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion. Defendant Jeffrey Epstein's key "lieutenant" in the organization was defendant [REDACTED] who served as both his scheduler and a recruiter/procurer of the girls. This was an important function, as the recruiting was necessary to satisfy Defendant Jeffrey Epstein's desire to abuse a large number of different minor girls with different (albeit similar) physical attributes and the scheduling was necessary to insure that the minor girls would be brought to Defendant Jeffrey Epstein's mansion to be sexually abused and prostituted at a time when Defendant Jeffrey Epstein was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement).

L.M. v. Jeffrey Epstein, Case No. 502008-CA-028051 XXXXMB AD (15th Cir. Fla.). The RICO Complaint specifically alleged that EPSTEIN procured dozens of girls to be sexually abused in this way. (For the convenience of the Court, a copy of the complaint by L.M. raising a RICO claim is attached to this response as Exhibit "B".)

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It is these RICO allegations that EPSTEIN is now alleging EDWARDS filed "when there was no good faith basis for doing so." Second Amended Complaint at ¶ 32(9). To defend himself against this allegation, EDWARDS must now obviously establish that there was a "good faith basis" for the RICO claims. EDWARDS intends to establish that good faith basis by (among other things) showing that each and every allegation in the RICO Complaint was true. For example, with regard to the allegations quoted above, EDWARDS is now entitled to ask whether EPSTEIN was (in the words of the RICO allegation) "directing his underlings how to recruit and procure young girls for his sexual activities and when to bring the girls to his mansion." As another example, EDWARDS is now entitled to ask whether EPSTEIN was (in the words of the RICO allegation) arranging for "girls . . . [to] be brought to [his] mansion to be sexually abused and prostituted at a time when [he] was there (but not at the same time, when they might learn of other girls' identities and possibly become emboldened to report his activities to law enforcement)." Finally, since the RICO allegations contain general allegations about EPSTEIN running a criminal organization, all deposition questions about EPSTEIN's criminal organization procuring young girls for him are obviously proper and should be allowed.

As this Court knows, all of EPSTEIN's preposterous claims pretending to demonstrate some "abuse of process" are based on the allegation that EDWARDS' discovery tactics, including the filing of RICO counts, were allegedly done to further Scott Rothstein's Ponzi scheme. To highlight the level of bad-faith to which EPSTEIN stoops to make this allegation that EDWARDS' filing of the RICO count was somehow in furtherance of Rothstein's schemes and not done for proper purposes, each of the original three complaints that included a RICO

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count are attached. The Court will quickly notice something that EPSTEIN and his army of attorneys have known all along to be true – each of these complaints was filed in 2008, while EDWARDS was a sole practitioner, months before knowing Rothstein or joining the Rothstein firm. (the complaint filed on behalf of L.M. was already referenced above as Exhibit “B”; E.W. v. Jeffrey Epstein and [REDACTED], 50 2008 CA 028051XXXXMB AD (15th Cir. Fla.) Exhibit “C”; Jane Doe v. Jeffrey Epstein, 08-80893-CIV-Marra/Johnson, (United States District Court Southern District of Florida) Exhibit “D”).

IV. EDWARDS Is Entitled to Ask Questions About Whether He Was Pursuing Productive Lines of Discovery.

EPSTEIN also contends that EDWARDS “made illegal, improper and perverted use of the civil process” by conducting “unreasonable and unnecessary ‘discovery,’ [and] making unfounded allegations” (¶ 32)). By making such allegations, EPSTEIN is obviously opening himself up for questions about what the discovery would have revealed and whether the discovery involved “unfounded” allegations.

As a specific example, EPSTEIN alleges that EDWARDS engaged in discovery without “legitimate purpose” by asking three of EPSTEIN’s jet pilots about sexual activities on EPSTEIN’s aircraft. Second Amended Complaint at ¶ 32(1). To defend against this allegation, EDWARDS is now entitled to ask EPSTEIN whether he was sexually abusing young girls on EPSTEIN’s airplane. Obviously, if EPSTEIN was engaged in such abuse – which he was, that would have been highly relevant to the RICO claim that EDWARDS was pursuing for his

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clients, and even more importantly, it would have been relevant to the punitive damages claims that were brought by each of EPSTEIN's sexual abuse victims.

As another specific example, EPSTEIN alleges that EDWARDS had no "legitimate purpose" in requesting to depose TV personality Donald Trump, law professor Alan Dershowitz, magician David Copperfield, and other individuals. Second Amended Complaint at ¶ 32(2). Clearly EDWARDS is now entitled to ask EPSTEIN whether these individuals possessed knowledge about EPSTEIN sexually abusing young girls and whether these individuals had knowledge of how EPSTEIN was procuring these young girls to abuse. In fact, in this case, the statement of [REDACTED] was taken wherein she describes being constantly abused while serving as EPSTEIN's travel-along underage sex slave for years. She clearly indicates in her statement that EPSTEIN abused underage children everywhere, including his airplanes, and that EPSTEIN's pilots and certain other individuals, including Dershowitz, had information relevant to EPSTEIN's repeated abuse of underage girls.

As yet another example, EPSTEIN alleges that EDWARDS had no basis for filing a motion alleging EPSTEIN was going to transfer assets outside the country to avoid paying damages to his sexual assault victims. Second Amended Complaint at ¶ 32(10). To defend against this allegation, EDWARDS is now entitled to ask whether EPSTEIN was afraid of being held liable on the numerous claims being filed against him and whether, as a result, he began liquidating assets and moving funds to off-shore bank accounts, placing assets in the names of others, or transferring property, money or assets to other hidden places.

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The fact is that EPSTEIN, and his counsel, know that each of the discovery efforts that EDWARDS took in prosecuting claims on behalf of his clients, about which they are currently complaining, were taken in good faith and for proper purposes. EPSTEIN and his counsel know that there was no good faith basis for the lawsuit filed and prosecuted against EDWARDS. EPSTEIN knows that there is no support for his ever-changing theory of abuse of process. EPSTEIN knows that each act he has taken in prosecuting this frivolous action against EDWARDS, including the filing of the original complaint and each amendment, the filing of motions, serving of subpoenas, taking of depositions, continually misrepresenting facts to this Court, and continually disseminating the various versions of his baseless action to many other people in the legal community, was done in bad faith. Each act that EPSTEIN has taken has been with the most malicious intent possible, and only to satisfy one of his improper ulterior motives, which include but cannot be limited to: intimidating and harassing EDWARDS, attempting to damage and tarnish EDWARDS' reputation, invading EDWARDS' privacy, causing EDWARDS to lose valuable time and expense, extorting EDWARDS through bullying tactics, attempting to force EDWARDS into abandoning his legitimate counter-claim needed to vindicate himself, and to inflict as much stress and emotional pain as possible as a means of getting revenge against EDWARDS. It is clear that EPSTEIN wants revenge for EDWARDS' successfully prosecuting EPSTEIN for his molestation of children, for vigorously pursuing an action in Federal Court to overturn EPSTEIN's Non-Prosecution Agreement, for informing authorities of EPSTEIN's probation violations, and for exposing EPSTEIN's criminal enterprise that worked in concert to molest dozens of underage children.

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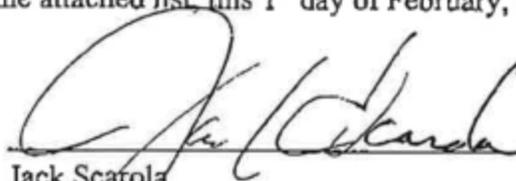
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For all these reasons, EDWARDS is now clearly entitled to ask EPSTEIN about the discovery that was going on in the civil cases and whether it was going to produce highly relevant information to support the claims of EDWARDS' three clients.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all counsel on the attached list, this 1st day of February, 2012.



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