

JEFFREY EPSTEIN,

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Plaintiff,

vs.

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

Defendants.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S AFFIDAVIT IN  
SUPPORT OF HIS MOTION FOR A PROTECTIVE ORDER AND  
INCORPORATED MEMORANDUM OF LAW

I, Jeffrey Epstein, having been first duly sworn, depose and state the following:

1. That I am over 18 years old and have personal knowledge of the facts and circumstances surrounding this case.
2. That on December 21, 2012, Bradley Edwards served me with two separate discovery requests in the above-referenced case, seeking to discover my financial net worth.
3. That this financial net worth discovery under these circumstances would violate my right to financial privacy as guaranteed by the Constitution of the State of Florida.

4. That this financial net worth discovery is designed to embarrass, harass and oppress me based upon the following:

a. That Edwards has engaged in and continues to engage in a systematic course of conduct designed to locate potential plaintiffs who might retain him and/or his firm in litigation against me;

b. That Edwards continues to actively prosecute a case against the United States of America in Federal Court with the intention of nullifying an agreement between the United States of America and myself;

c. That to achieve these goals, Edwards uses highly aggressive tactics including:

i. Extra-judicial interviews with foreign and domestic press, including but not limited to The Palm Beach Post, The Huffington Post (██████████), The Guardian, The Telegraph, and The Fort Lauderdale Sun-Sentinel;

ii. Inflammatory postings on the internet including postings on Edwards's firm's website and Facebook pages;

iii. Using emotionally charged pejoratives when referring to me;

iv. Using my purported relationships with high profile celebrities and personalities to garner media attention, such as, but not limited to, England's Prince Andrew, Former President Bill Clinton and Law Professor Alan Dershowitz; and

v. Noticing some of these same high profile celebrities and personalities for deposition.

5. That I had a good faith basis to file the lawsuit against Scott Rothstein, Bradley Edwards and L.M.;

6. That during my deposition on January 25, 2012, Mr. Scarola, on behalf of his client, used this opportunity to ask irrelevant, harassing, and embarrassing questions over and above the repeated objections of my counsel.

7. That at said deposition, Mr. Scarola stated that his questions were relevant and necessary because they were intended to support a RICO claim that he intended to bring on behalf of Edwards. However, the fact that this claim has not been brought is proof that the questions asked by Mr. Scarola were merely intended for no other purpose than to harass, embarrass, and oppress me.

8. That Edwards's actions in other litigation in which he has been the attorney of record irrefutably proves that even where the Court orders the proper protections from further widespread dissemination of the produced documents in collateral litigations, these orders are, in essence, meaningless and do not prevent Edwards from misusing the documents requested. Specifically, Edwards circumvented the terms of an agreed-to, negotiated Joint Stipulation in *Doe v. Epstein* by seeking to disclose confidential negotiations between my counsel and the U.S. Attorney that I was compelled by the court to produce where said production was predicated on the protections from public disclosure through the negotiated Joint Stipulation.

9. That if permitted, such unfettered access to my financial information, business ventures, and business associates, Edwards will continue his well established pattern of seeking harassing, oppressive and embarrassing discovery requests and misuse of same; especially in light of the fact that he is still seeking potential plaintiffs to bring further lawsuits against me.

10. In an effort to render such discovery unnecessary, I am willing to stipulate to my

financial net worth being in excess of one hundred million dollars.

FURTHER AFFIANT SAYITH NAUGHT.

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JEFFREY EPSTEIN

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State of New York )  
County of New York )

Before me, the undersigned authority, this day personally appeared Jeffrey Epstein, who produced \_\_\_\_\_ as Identification, and who first being duly sworn, says that all of the matters contained herein are true and correct.

\_\_\_\_\_  
NOTARY PUBLIC,

Sworn and Subscribed before me this January 23, 2013.