

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
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CASE NO.: 09-34791-RBR
Chapter 11

IN RE:

ROTHSTEIN ROSENFELDT ADLER, P.A.,

Debtor.

JOINT EX PARTE MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER
(Expedited Relief Requested)

Herbert Stettin, the Chapter 11 Trustee (“Trustee”) of the Debtor, Rothstein Rosenfeldt Adler, P.A. (“RRA”), and Jeffrey Epstein, a Plaintiff in the Circuit Court of the Fifteenth Judicial Circuit in and for Palm Beach County, Florida, *Jeffrey Epstein v. Scott Rothstein, et al.*, Case No. 50 2009CA040800XXXXMB AG (hereinafter “Epstein”), by and through undersigned counsel, do hereby file this Stipulated Protective Order (“Stipulated Protective Order”) by and between the Trustee and Epstein, attached hereto as Exhibit “A”, and in support thereof state:

1. Pursuant to this Court’s Order Granting Trustee’s Motion Seeking a Protective Order and Approving Proposed Document Production Protocol (“Order”) [D.E. #672], the Trustee and Epstein jointly move for the entry of the Stipulated Protective Order.
2. The Trustee and Epstein request that the Stipulated Protective Order be entered without a hearing as the relief requested herein is in compliance with the Court’s Order.
3. The Trustee and Epstein are requesting expedited relief so that Epstein can quickly begin the process of reviewing and analyzing any responsive documents.

WHEREFORE, the Trustee and Epstein jointly move for the entry of the Stipulated Protective Order by and Between Trustee and Epstein attached hereto as Exhibit "A", and for any and all other relief this Court deems just and equitable.

Dated: March 30, 2011.

Respectfully submitted:

s/ Lilly A. Sanchez
LILLY A. SANCHEZ
Florida Bar No. 195677
lsanchez@fowler-white.com
FOWLER WHITE BURNETT
Counsel for Jeffrey Epstein
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, FL 33131
Tel: (305) 789-9200
Fax: (305) 728-7579

s/ Charles H. Lichtman
CHARLES H. LICHTMAN
Florida Bar No. 501050
clichtman@bergersingerman.com
BERGER SINGERMANN
Counsel for the Chapter 11 Trustee
350 East Las Olas Boulevard, 10th Floor
Fort Lauderdale, FL 33301
Tel: (954) 525-9900
Fax: (954) 523-2872

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via the Court's CM/ECF electronic noticing system to all electronic filing participants with respect to this proceeding, this 30th day of March, 2011. I also certify that the foregoing document is being served this 30th day of March, 2011 by U.S. mail to all parties listed on the mail service list below, and who are not registered to receive Notice of Electronic Filing in this case.

By: s/ Charles H. Lichtman
Charles H. Lichtman
Florida Bar No. 501050
clichtman@bergersingerman.com
Isaac Marcushamer
Florida Bar No. 0060373
imarcushamer@bergersingerman.com
Berger Singerman, P.A.
Attorneys for Trustee
350 E. Las Olas Boulevard, Suite 1000
Fort Lauderdale, FL 33301
Telephone: (954) 525-9900
Facsimile: (954) 523-2872

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