

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

v.

BRADLEY J. EDWARDS, et al.,

JUDGE: HAFELE

Defendants/Counter-Plaintiff.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S ANSWERS TO  
DEFENDANT/COUNTER-PLAINTIFF BRADLEY EDWARDS'S EXPERT  
INTERROGATORIES**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.340 of the *Florida Rules of Civil Procedure* hereby serves the following responses to Defendant/Counter-Plaintiff Bradley Edwards's ("Edwards") Expert Interrogatories as follows:.

**EXPERT INTERROGATORIES TO JEFFREY EPSTEIN**

1. State the name, address and profession of each person whom you expect to call as an expert witness at trial or on whose expert opinions others have relied in forming opinions which you will or may offer at trial.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

2. With regard to each listed above, state his/her background, education and experience which qualify him/her to testify as an expert in his/her area of expertise; and/or in lieu thereof, please provide a copy of each expert's most recent curriculum vitae.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

3. Give the name or title of each paper which each expert has authored in the field of his/her expertise.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

4. State the name, volume and page number of the publication in which each article or paper listed above can be found.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

5. State the substance and identify the source of the facts on which each expert has relied in forming any opinion about which the expert is expected to testify.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

6. Give a complete list of all documents, depositions, exhibits, plans, drawings, ordinances or statutes which each expert has reviewed informing his/her opinion.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

7. State the opinions to which the experts aforementioned are expected to testify.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

8. Give a summary of the grounds of each opinion stated.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

9. Identify where the expert listed above has practiced or worked in his/her field during the past 10 years?

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

10. As to each position identified above, please state:

- a. Whether the expert was self-employed, employed by someone else or associated as a partner.

Each address where the expert practiced or was employed.

- b. The dates the expert was with each employer.

- c. The type of duty the expert performed with each employer.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

11. If the expert has not practiced or worked in his/her field during the last 10 years, what was his/her employment during this time?

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

12. Did the expert prepare anything or have anything prepared setting forth his/her opinions or conclusions reached from his/her examination or any tests he/she conducted?
  - a. If so, state the date of preparation
  - b. The name or other means of identification of each individual and entity to whom the material prepared was distributed.
  - c. The name and address of each person who has present custody of each non-identical copy of the material.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

13. Did the expert prepare or have prepared any material based upon tests, examinations or analyses of documents that he/she conducted in which he/she did not render an opinion?
  - a. If so, state description of all material that was prepared by or for the expert.

- b. The date that the material was prepared.
- c. The name or other means of identification of the person to whom all material was distributed.
  
- d. The name and address of the person who has present custody of each non- identical copy of the material.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

- 14. If you will do so without a Request to Produce, attach a copy of all materials prepared by or for each expert on the basis of his/her tests, examinations or analyses to your answers to these Interrogatories.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

- 15. Is the expert to be compensated for his/her work and efforts in connection with this action?
  - a. If so, describe in detail the basis and/or rate of compensation, the total amount paid to or on behalf of the expert, the amount currently payable to the expert for all services rendered as of the date of your answers to these interrogatories.
  - b. Estimate the total amount of time reasonably expected to be spent by the expert in completing all services to be rendered in this matter from the date of your answers to the conclusion of the case.
  - c. Describe all additional services expected to be rendered by the expert.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES**

**ACCORDINGLY.**

16. Has the expert served as an expert witness in any other litigated case in the past 5 years?

If so, state as to each case:

- a. The style of the case, the Court in which it was filed and the names and addresses of the attorneys involved.
- b. Whether the expert was retained on behalf of the Plaintiff or Defendant.
- c. The general subject matter as to which the expert provided services.
- d. Whether sworn testimony was given in the case, and, if so, whether the expert or you are in possession of a transcript of the testimony.

**ANSWER: EPSTEIN HAS NOT RETAINED AN EXPERT WITNESS FOR THIS MATTER, BUT UPON EXAMINATION OF THE NEWLY-ADDED EXPERT WITNESS IDENTIFIED BY EDWARDS ON OCTOBER 5, 2017, EPSTEIN MAY RETAIN A REBUTTAL EXPERT AND WILL UPDATE THESE INTERROGATORIES ACCORDINGLY.**

/s/ Tonja Haddad Coleman  
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CASE NO. 502009CA040800XXXXMBAG

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