

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

JEFFREY EPSTEIN,

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS,  
individually, and [REDACTED], individually,

Defendants.

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NOTICE OF TAKING DEPOSITION

PLEASE TAKE NOTICE that the undersigned attorney or an attorney of the firm will  
take the deposition of:

Name: Cara Holmes  
Date and Time: June 10, 2011 at 10:00 [REDACTED].  
Place: Fowler White Burnett, [REDACTED].  
One Financial Plaza  
100 Southeast 3rd Avenue, 21st Floor  
Fort Lauderdale, Florida 33394

Upon oral examination before HI TECH/UNITED REPORTING, Notary Public, or any other  
notary public or officer authorized by law to take depositions in the State of Florida. The oral  
examination will continue from day to day until completed. This deposition is being taken for  
the purposes of discovery, for the use at trial, or for such other purposes as are permitted under  
the rules of the Court.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed, faxed  
and emailed on this \_\_\_\_\_ day of May, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart

& Shipley, Attorneys for Bradley J. Edwards, 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409, Jack Goldberger, Esq., Atterbury Goldberger & Weiss, 250 Australian Avenue, South, Suite 1400, West Palm Beach, FL 33401-5012 and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, One E. Broward Blvd., Ste 700, Fort Lauderdale, FL 33301.

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Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954  
FOWLER WHITE BURNETT ■■■  
Phillips Point  
777 South Flagler, Suite 901  
West Palm Beach, FL 33401  
(561) 802-9044  
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cc:  
Hi-Tech/United Reporting, Inc.  
1218 S.E. 3rd Avenue  
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IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,  
Plaintiff,

v.

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXMB AG

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

**SUBPOENA FOR DEPOSITION DUCES TECUM**

THE STATE OF FLORIDA:

TO: **Cara Holmes**  
**1220 NW 157<sup>th</sup> Avenue**  
**Pembroke Pines, FL 33028**

**YOU ARE COMMANDED** to appear before a person authorized by law to take depositions at the law offices of Fowler White Burnett, ■■■, One Financial Plaza, 100 S.E. 3<sup>rd</sup> Avenue, 21<sup>st</sup> Floor, Fort Lauderdale, FL 33394 on the **10th day of June, 2011, at 10:00 ■■■**, for the taking of your deposition in this action and to have with you at that time and place the following:

***See Attached Schedule "A"***

If you fail to appear, you may be in contempt of court.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated on \_\_\_\_\_, 2011.

For the Court

By: \_\_\_\_\_  
Joseph L. Ackerman, Jr.

Joseph L. Ackerman, Jr.  
Fowler White & Burnett, ■■■.  
*Attorneys for Plaintiff, Jeffrey Epstein*  
FOWLER WHITE BURNETT ■■■.  
Phillips Point  
777 South Flagler, Suite 901  
West Palm Beach, FL 33401  
(561) 802-9044  
(561) 802-9976

SCHEDULE "A"

I. DEFINITIONS

1. "Document" means any document known to you and every such document which can be located or discovered by reasonably diligent efforts; any original or copy of such in your custody, possession or control, including, but not limited to:

any printed (whether typed or written by hand), recorded, taped, electronic (e.g., e-mails and text messages), graphic, or other tangible matter from any source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original and any copies which contain markings or notations,

all attachments, amendments and addenda of any and all writings.

all correspondence, letters, notes, notations, memoranda, inter-office communications, releases, agreements, contracts, books, pamphlets, studies, minutes of meetings, recordings or other memorials of any type of personal or telephone conversations, meetings or conferences (including, but not limited to, telephone bills and long distance charge slips), reports, analyses, evaluations, diaries, calendars, desk pads, appointment books, transcripts, journals newspapers, periodical or magazine materials, and any material underlying, supporting or used in the preparation of any documents or record whatsoever.

2. Written "Communications" means any documents evidencing communications between you and another person or persons of any kind.

3. "Referring to," "reflecting," "supporting," "evidencing" or "relates to" means in any way directly or indirectly, concerning, disclosing, describing, confirming, or representing.

4. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.

5. "Epstein" means the Plaintiff.

6. "Holmes" "You" or "Yours" refers to Cara Holmes.

7. "Edwards" means Defendant Bradley J. Edwards. "Rothstein" means Defendant Scott Rothstein. "RRA" or the "Firm" means Rothstein Rosenfeldt Adler, [REDACTED].

8. "Person" means any individual natural person, partnership, association, firm, corporation, organization, trust, governmental or public entity, and any of its agents, employees, assigns or representatives.

9. "Complaint" refers to the initial pleading or any Amended Complaint filed by Plaintiff in this Action.

10. All other terms are defined as they are in the Complaint.

11. Unless otherwise stated, the time frame for this Request is from October 1, 2008, through December 01, 2010.

### REQUESTS

1. Documents evidencing any and all written communications between you and any of the following employees, independent contractors, attorneys, partners, shareholders, agent or other representatives of RRA regarding any pending or contemplated litigation, past or settled litigation, investigations, surveillance, incidents of misconduct or claims against Epstein from September 2008 to the present:

- a. Rothstein;
- b. Edwards;
- c. Russell Adler;
- d. William Berger;
- e. Mike Fisten;
- f. Ken Jenne;
- g. Wayne Black;
- h. Patrick Roberts;
- i. Patrick Diaz

2. All written communications between you and any of the following employees, independent contractors, attorneys, partners, shareholders, agents or other representatives of RRA regarding any pending or contemplated litigation, past or settled litigation, investigations, surveillance, incidents of misconduct or claims against Epstein from September 2008 to the present.

- a. Rothstein;

- b. Edwards;
- c. Russell Adler;
- d. William Berger;
- e. Mike Fisten;
- f. Ken Jenne;
- g. Wayne Black;
- h. Patrick Roberts;
- i. Patrick Diaz

3. For the time period from March 1, 2009 to present, any and all documents between or on behalf of any agent of RRA (including you), and any third party regarding a purported settlement of any litigation between Epstein and an RRA client, or the financing of any litigation by an RRA client against Epstein (whether existing or fabricated clients), including but not limited to those:

- a. indicating that litigation with Epstein has been settled;
- b. soliciting or receiving money in return for settlement funds allegedly paid or to be paid by Epstein;
- c. soliciting money to help finance ongoing litigation against Epstein;
- d. soliciting money to be given to, or used on behalf of, any Plaintiffs in litigation against Epstein; and
- e. concerning payments made by RRA to or on behalf of any client that sued Epstein.

4. All documents which purport to evidence any transfer of funds or property from Epstein to RRA, Rothstein or any Rothstein-related entity for the settlement of any case (real or fabricated) against Epstein.

5. Any employment agreements or documents between You and RRA describing your compensation and benefits as an employee of RRA.