

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

CASE NO.: 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff,

v.

SCOTT ROTHSTEIN, individually, and  
BRADLEY EDWARDS, individually,

Defendants.

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**PLAINTIFF'S SUPPLEMENTAL MOTION TO COMPEL DISCOVERY<sup>1</sup>**

Plaintiff, Jeffrey Epstein ("Epstein"), pursuant to Fla. R. Civ. P. 1.380, moves for an order compelling Defendant, Bradley Edwards ("Edwards"), to provide complete and responsive answers to interrogatories dated July 12, 2017, September 5, 2017, and October 13, 2017, and to produce all documents responsive to requests for production dated September 5, 2017, and October 13, 2017, and in support states:

**INTRODUCTION**

Edwards is not a victim. Edwards is a lawyer who loves the spotlight and all of the financial rewards that the spotlight brings. While Edwards represented alleged sexual abuse victims, and brought claims against Epstein on behalf of those alleged victims, Edwards is not a victim despite what he now claims in this lawsuit. To the contrary, Edwards' fame, fortune and success grew substantially as a direct and proximate result of his multi-faceted litigation with Epstein.

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<sup>1</sup> This motion supplements Epstein's prior motions to compel discovery from Edwards, including Epstein's Motion to Compel Discovery Responses from Edwards filed on September 25, 2017.

To be clear, Epstein takes no issue with Edwards's legitimate advocacy on behalf of his clients. Edwards's advocacy, however, went well beyond legitimacy and ultimately existed to serve another master, a sinister Ponzi scheme that operated out of Edwards's and co-defendant Scott Rothstein's law firm, Rothstein, Rosenfeldt Adler. As is now well-known, at that law firm, despite what its name implies, the main business was the creation and perpetration of a Ponzi scheme that relied upon purported legal settlements of purported legal claims and the sale of interests to investors, which ultimately resulted in losses of over \$1,000,000,000. And at the center of that Ponzi scheme, in the boiler room where scintillating civil claims were created, marketed and sold, was Edwards' litigation against Epstein. Investors were provided "estimates" of the value of purported claims and, upon information and belief, were provided alleged details of the cases and evidence that would be used to extort multi-million dollar settlements from Epstein. Investors accepted the alleged facts and settlements as conveyed by these Florida Bar licensed attorneys, they invested, and the Ponzi scheme stayed alive.

The record is clear that Edwards, while the Ponzi scheme was in full swing and in dire need of additional investor funds, was taking steps in the Epstein litigations that were beyond the limits of rational advocacy for any reasonable litigation attorney....but perhaps very interesting to an investor. Edwards abused the process of this Court to help defraud investors and to financially support the continuation of the Rothstein, Rosenfeldt Adler law firm, which was, in reality, mostly a Ponzi scheme. Edwards filed a federal lawsuit against Epstein based on alleged sexual abuse --- but never served the lawsuit on Epstein. The lawsuit was unnecessary and duplicative of an existing lawsuit pending in state court. Yet the filing just sat there, in the public records, available for investors to review and use to attempt to calculate present values for anticipated settlements based on numbers and alleged information provided by the Rothstein,

Rosenfeldt Adler law firm. In other litigations, irrelevant and shockingly invasive discovery was pursued -- the type of discovery that makes no sense to an experienced litigator but may be enticing to an investor. Edwards sought to turn inside out and upside down every personal and private detail of Epstein's life. Edwards persecuted Epstein's friends and associates to make them uncomfortable with and stop communicating with Epstein, and otherwise sought to harass and humiliate Epstein and destroy the remaining relationships and privacy he had left after his release from prison. These actions had no reasonable relationship to the actual claims Edwards brought on behalf of alleged victims and were not undertaken "in the pursuit of justice." This was a first class shakedown -- an abuse of process -- and served as fuel to feed the Ponzi scheme fire that was the Rothstein Rosenfeldt Adler law firm.

To protect what remained of his rights, personal privacy, and personal relationships, Epstein justifiably filed an action against Edwards and Scott Rothstein to stop the inappropriate litigation conduct. As will be demonstrated at trial, Epstein reasonably believed—based on 1) public information from the government and investors caught in the Ponzi scheme; 2) allegations and news reports that Rothstein used Edwards's cases against Epstein to dupe third parties into investing in non-existent settlements; 3) Edwards's abusive use of discovery; and 4) Edwards's commencement of a case in federal court when a duplicative case was already pending in state court—that he had a case against Edwards.

In response, Edwards has asserted a meritless claim for malicious prosecution, which he has also used to further grow his public profile and generate business. Unsurprisingly, in so doing, Edwards seeks several types of purported damages from Epstein. Edwards claims the following damages: (a) injury to his reputation; (b) mental anguish, embarrassment, and anxiety; (c) fear of physical injury to himself and members of his family; (d) the loss of value of time

required to be diverted from his professional responsibilities; and (e) the cost of defending against Epstein's claims. See Edwards' Fourth Amended Counterclaim.

While Epstein denies that Edwards has stated a claim, and denies that Edwards has suffered any damages whatsoever, he is nonetheless entitled to discovery on the issues Edwards wants to litigate, which include each item of alleged damages, Edwards's trial witnesses, and Edwards's late disclosure of an expert witness. Yet despite the fact that we are presently on the eve of trial, Edwards continues to play games in discovery. As described below, Edwards continues to "hide the ball" and refuses to provide Epstein with the relevant information he needs and is entitled to on these issues. Edwards cannot have it both ways. He needs to provide the requested discovery, which clearly relates to the relevant issues in this case, or he needs to be prevented from offering evidence at trial on these issues. Regardless, Epstein has been, and continues to be, prejudiced by Edwards's refusal to comply with his discovery obligations.

#### **INTERROGATORIES DATED 7/12/17**

1. On July 12, 2017, Epstein served interrogatories to Edwards, seeking information about Edwards' witnesses in preparation for trial.

2. On August 11, 2017, Edwards served his response, which contains incomplete and insufficient responses. A copy of Edwards's response to the interrogatories dated 7/12/17 is attached as Exhibit A.

3. In interrogatory number 1, Epstein asked:

**As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:**

**The proper name, address, telephone number, electronic mail address, or other means of contact for each witness.**

4. In an obvious attempt to withhold information and prevent Epstein from contacting trial witnesses, Edwards failed to provide a single telephone number or e-mail address for any of his 157 witnesses. Instead, Edwards provided office addresses, office addresses for attorneys, and, for some witnesses, no addresses at all. It would be impossible for Epstein to attempt to contact Edwards's trial witnesses by engaging in a letter writing campaign with 157 witnesses. It is also highly unlikely that the provided mailing addresses are Edwards's means of contact with these witnesses. The information provided is insufficient, deprives Epstein of his right to contact trial witnesses in this case, and has prevented Epstein from properly preparing for trial. Edwards should be compelled to fully respond and provide all means of contact for every individual identified on his list of trial witnesses. If the information is not provided forthwith, the witnesses should be stricken from the witness list.

5. In interrogatory number 2, Epstein asked:

**As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:**

**Each contested factual issue expected to be addressed by the witness, including identifying with particularity as to which element(s) of your claim for Malicious Prosecution this witness's testimony is applicable.**

6. Edwards's response to this interrogatory is woefully deficient. Edwards does not identify the factual issues expected to be addressed by each witness. Rather, Edwards simply provides boilerplate responses, and states that many of the witnesses will address the probable cause or malice elements of the malicious prosecution claim, that their claims were true, and that discovery would have provided relevant information. The response is insufficient, and provides Epstein with no notice of the actual factual issues to be addressed at trial by each of these witnesses.

7. In interrogatory number 3, Epstein asked:

**As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:**

**A detailed description of the testimony expected to be presented at trial by the witness as to each contested factual issue and element of your claim against Epstein.**

8. Edwards's response to this interrogatory is woefully deficient. Edwards does not provide a detailed description of the testimony expected to be presented at trial by each witness. Rather, Edwards provides only boilerplate responses, and states that many of the witnesses will address the probable cause or malice elements of the malicious prosecution claim, that their claims were true, and that discovery would have provided relevant information. This response is insufficient, and provides Epstein with no notice of the actual testimony expected to be presented at trial by each of these witnesses.

9. In interrogatory number 4, Epstein asked:

**As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:**

**A description of the Trial Exhibit List number of each exhibit expected to be introduced into evidence by the witness.**

10. Edwards's response, "Unknown at this time which exhibits will be introduced through which witness," is both remarkable and insufficient. Edwards has several hundred exhibits listed on his exhibit list and over 150 witnesses. The case is on the eve of trial. It is beyond belief that Edwards has no idea which trial exhibits he currently "expects" may be introduced into evidence by each witness. While things may certainly change, and it is therefore unknown what exhibits ultimately will be introduced through each witness, that is not the question asked of Edwards. Epstein is entitled to know, as of this moment in time, Edwards's

view as to which exhibits he expects to introduce into evidence by what witnesses. Edwards should not be permitted to “hide the ball” on this issue.

11. In interrogatory number 5, Epstein asked:

**As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:**

**A description of the Trial Exhibit List number of each exhibit introduced through other means about which the witness is expected to testify, together with a description of the witness’ expected testimony regarding each exhibit.**

12. Edwards’s response, “Unknown at this time which exhibits will be introduced through which witness,” is, again, both remarkable and insufficient. Edwards has several hundred exhibits listed on his exhibit list and over 150 witnesses. On the eve of trial, it is beyond belief that Edwards has no idea which trial exhibits he currently “expects” may be introduced at trial and testified about by certain witnesses. It is also unrealistic that Edwards has no idea what witness testimony may be regarding any of the hundreds of listed exhibits. While things may certainly change, and it is therefore unknown what testimony ultimately will be introduced through each witness at trial, that is not the question asked of Edwards. Epstein is entitled to know, as of this moment in time, Edwards’s view, as to exhibits introduced through other means, about what he expects a witness to testify and what the expected testimony will be regarding each exhibit. Edwards should not be permitted to “hide the ball” on this issue.

13. In sum, Edwards’ responses to the interrogatories dated July 12, 2017 contain incomplete and insufficient responses, and deprive Epstein of the right to know the witnesses and evidence to be used against him at trial. This Court should compel Edwards to provide responsive, full and appropriate responses to the questions posed.

### INTERROGATORIES DATED 9/5/17

14. On September 5, 2017, Epstein served interrogatories on Edwards, seeking information about Edwards's alleged damages.

15. On October 5, 2017, Edwards served his response, which contains incomplete and insufficient responses. A copy of Edwards's response to the interrogatories dated 9/5/17 is attached as Exhibit B.

16. While all known facts paint the picture that Edwards profited immensely from litigation with Epstein, Edwards claims to have been damaged by this litigation. As noted above, Edwards is claiming damages of: (a) injury to his reputation; (b) mental anguish, embarrassment, and anxiety; (c) fear of physical injury to himself and members of his family; (d) the loss of value of time required to be diverted from his professional responsibilities; and (e) the cost of defending against Epstein's claims. See Edwards' Fourth Amended Counterclaim.

17. To discover the facts on these issues, Epstein propounded interrogatories regarding Edwards's damages claims, including questions about Edwards' employment history, earnings and net worth, financial compensation agreements relating to his representation in Epstein-related cases, and the specific bases for Edwards's damages claim.

18. Edwards responded with almost a complete roadblock, objecting and refusing to answer 37 of the 39 interrogatories. Edwards, for example, refuses to reveal the ways he profited from litigation with Epstein, the money he made from such litigation, and the money he will likely continue to make in the future from an assortment of deals based on his "trademark" Epstein litigation.

19. Under Fla. R. Civ. P. 1.280, "[p]arties may obtain discovery regarding any matter, not privileged, that is relevant to the subject matter of the pending action, whether it relates to the

claim or defense of the party seeking discovery or the claim or defense of any other party. . .”

20. The information sought is relevant and necessary because Edwards is seeking damages for, among other things, injury to reputation and loss of value of time diverted from professional responsibilities. Thus, Edwards claims he has lost money as a practicing attorney because he was handling 1 additional case -- this case -- adverse to Epstein. In making such a claim, Edwards has put his employment history, earnings and net worth at issue, as these issues are relevant to determining whether he has in fact suffered a “loss” based on his involvement in this case.

21. Edwards has taken an unreasonable, obstructionist approach to discovery to prevent Epstein from preparing to defend the damages claims at trial. This is impermissible. If Edwards wants to withdraw his damage claims, Epstein will evaluate and consider a narrowing of the discovery. But, as presently alleged, Edwards’s damages claims require the provision of the information Epstein has requested.

22. Edwards refuses to say where he has worked, what positions he held, and what salary he has been paid. See, e.g., interrogatory numbers 1, 2, 3, 6.

23. While Edwards claims he has suffered financial loss, he refuses to provide any information about any purported loss during the time in question. See, e.g., interrogatory numbers 7, 8, 9, 10, 11, 12, 13, 14.

24. While Edwards claims to have suffered injury to reputation, he refuses to provide information regarding legal work he nonetheless obtained and profited from. See, e.g., interrogatory number 20.

25. Edwards refuses to provide information regarding how he has profited directly from litigation involving Epstein. See, e.g., interrogatory numbers 25, 26, 28, 29.

26. In interrogatory number 32, Epstein directly asked Edwards to describe in detail, quantify, and explain the alleged losses in this case:

**Please describe in detail, quantify and explain the financial loss, including the amount that you contend to have suffered as described in your Fourth Amended Counterclaim, to wit:**

- a. injury to your reputation;**
- b. mental anguish, embarrassment and anxiety;**
- c. fear of physical injury to you and members of your family;**
- d. the loss of value of your time required to be diverted from your professional responsibilities;**
- e. the cost of defending against Epstein's claims.**

27. On this basic question, which seeks to understand what Edwards is claiming in this case, Edwards dodges the question and provides no substantive response:

**RESPONSE: Each of the listed elements of damage is presently unliquidated and will be established by the verdict of the jury empaneled to hear this case and entrusted with the responsibility to render a verdict that fully and fairly compensates Bradley Edwards for every element of damage sustained by him in the past and continues to be sustained by him in the future. As the jury will be instructed, there is no exact measure for such damages, but their verdict is required to take all evidence presented to them under consideration and to be fair, just and reasonable under the circumstances as they find them to exist.**

28. The response is inadequate and fails to inform Epstein of the bases for the losses claimed. Epstein asked Edwards to describe in detail each of the purported losses, to quantify each of the losses he contends to have suffered, and to explain them. Edwards should be required to provide the specific, detailed information that was requested.

29. Epstein also asked Edwards about his use of Epstein's name to promote his practice. In interrogatory number 34, Epstein asked Edwards:

**Please describe in detail and identify with specificity every social media outlet, website, blog, printed materials, seminar materials, or any other printed or published media on which you, your law firm, or any association with which you are**

**affiliated has ever advertised, references, or otherwise places the name of Jeffrey Epstein, and include a detailed description and the date(s) of each and every such reference, advertisement, placement, publication, dissemination, or promotion, identify the persons or groups of persons to whom the same was made, and state the locations where made, and state whether or not the materials used in connection with such reference, advertisement, placement, publication, dissemination, or promotion are in your possession or control, or are still available on line or in print, and identify the persons or website from whom such materials may be obtained.**

30. Edwards, again, dodges the question:

**RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. . . .**

31. Obviously, if Edwards is publicizing his involvement in litigation adverse to Epstein, Edwards has not suffered the damages he claims relating to such litigation. Again, Edwards attempts to “hide the ball” and refuses to provide the requested information that directly bears on his claims of loss.

32. Moreover, while Edwards claimed in his discovery response that such publications were irrelevant, Edwards now plans to rely on similar evidence to establish damage to his reputation, and has made a late disclosure of a purported expert that is relying on such evidence. It is obvious that Edwards is playing games. Epstein is entitled to the information requested, and needs the information to hire his own expert to testify about the number of people who may have read articles discussing Epstein’s allegations tying Edwards to the Ponzi scheme.

33. In interrogatory number 35, Epstein asked Edwards about evidence supporting purported damage to reputation:

**Please describe with particularity any and all evidence, circumstances and events upon which you rely in asserting that your reputation was damaged as alleged in your Counterclaim,**

**including, without limitation, specifically describing how that damage is attributable to Epstein's lawsuit against you.**

34. Edwards's answer was non-responsive:

**RESPONSE: The allegations of Epstein's maliciously filed Complaint are defamatory per se.**

35. Epstein did not ask for Edwards's opinion as to the potential defamatory nature of the Complaint. Epstein asked Edwards to describe, with particularity, all evidence upon which he relies to assert that his reputation was damaged. Edwards should be compelled to provide such information. Alternatively, the jury should be instructed that it cannot consider any evidence in support of purported damage to reputation other than the Complaint in this case.

36. In interrogatory number 35, Epstein asked Edwards about the purported loss of value of time required to be diverted from professional responsibilities:

**Please explain in detail the amount of time required to be diverted from your professional responsibilities including, but not limited to, the time lost, each date on which the time was lost, the case/matter on which you would have otherwise spent the time, your billable hourly rate, if any, you allege to have lost, and for each case/matter identified, please provide the amount of income derived by you, your firm, or any entity acting on your behalf in the matter. Please detail all other evidence, methods and calculations on which you intend to rely to quantify the damages you claim are attributable to time diverted from your professional responsibilities as alleged in your Counterclaim.**

37. Edwards' response is woefully deficient:

**RESPONSE: Time diverted from Bradley Edwards' professional responsibilities is reflected in previously produced time records and will be updated prior to the expiration of discovery. Counter-Plaintiff, however, objects to the interrogatory....**

38. Edwards refers Epstein to time records, but provides no information as to the case/matter on which he would have otherwise spent the time, his billable hourly rate allegedly lost, and the amount of income derived on the case/matter. Nor does Edwards provide evidence,

methods and calculations pursuant to which he quantifies the purported damages. The information requested is relevant and necessary to defend Edwards's claim that he was damaged by spending time on this matter. Edwards should be compelled to provide such information. Alternatively, the jury should be instructed that it cannot consider any evidence in support of purported loss of value of time required to be diverted from professional responsibilities.

39. In sum, Edwards' responses to the interrogatories dated September 5, 2017, are incomplete and insufficient. Epstein has been, and continues to be, prejudiced by Edwards's refusal to provide relevant information pursuant to the discovery process. The Court should compel Edwards to provide responsive, full, and appropriate responses to the questions posed. Alternatively, the Court should prohibit Edwards from presenting evidence to the jury that was not disclosed in response to corresponding discovery requests.

#### **REQUEST FOR PRODUCTION DATED 9/5/17**

40. On September 5, 2017, Epstein served a request for production on Edwards, seeking documents about Edwards' damages claims.

41. On October 5, 2017, Edwards served his response, which objected to all 10 requests and made boilerplate objections. A copy of Edwards's response to the request for production dated 9/5/17 is attached as Exhibit C.

42. With respect to Request number 1, Epstein sought:

**A copy of all documents that relate to, or reference or include, any and all information requested in, or that you referred to in any way in providing your responses to, Plaintiff/Counter-Defendant Jeffrey Epstein's Interrogatories to Defendant/Counter-Plaintiff Bradley J. Edwards Relating to Damages, served contemporaneously herewith.**

43. Edwards objected to Request number 1 on the basis of attorney work product.

44. Edwards's objection lacks merit as Epstein is entitled to all documents that relate to, reference, or support the basis for Edwards's positions on the issues presented by the interrogatories. See, e.g., Grinnell Corp. v. Palms 2100 Ocean Blvd., Ltd., 924 So. 2d 887 (Fla. 4<sup>th</sup> DCA 2006). The work product doctrine does not protect the documents that have been requested, and Edwards should be ordered to produce them forthwith.

45. Requests 2-10 directly relate to the issue of damages claimed by Edwards:

**2. A copy of all documents that reflect, any and all promises, instruments, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any business arrangements between you and any and all law firms through which you rendered legal services at any time during the period in question, including, without limitation, cost sharing, fee splitting, fee percentage, profit sharing and/or profit participation terms and conditions including, but not limited to, your provision of legal services during your affiliation with Rothstein Rosenfeldt and Adler.**

**3. A copy of all documents reflecting, any and all instruments, agreements, contracts, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all trust arrangements, guardian arrangements, custodial arrangements or similar arrangements established by and/or for the benefit of each of LM, EW, and Jane Doe regarding the receipt, administration and/or payment or distribution of the proceeds of settlement of claims by LM, EW, or Jane Doe against Jeffrey Epstein.**

**4. A copy of all documents reflecting, any and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that you and/or your law firm and/or any other lawyer and/or law firm have or at any time during the period in question had with LM, EW, or Jane Doe, which in any way relate to allegations by LM, EW, or Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing**

arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

5. A copy of all documents reflecting, any and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that you, any law firm through which you have provided legal services, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other lawyer and/or law firm have or at any time during the period in question had with any and all attorneys, investigators, other professionals, contractors and consultants and witnesses with respect to this case or any other case involving the claims of each of LM, EW, and Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

6. A copy of all documents reflecting, and all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format), and all amendments, modifications and supplements thereto, memorializing, any and all arrangements that Paul Cassell, Jack Scarola, Searcy Denney Scarola Barnhart & Shipley PA, or Boies Schiller Flexner LLP have or at any time during the period in question had with any and all attorneys (including, without limitation, you, any law firm through which you then rendered legal services, and Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL), investigators, other professionals, contractors and consultants and witnesses with respect to this case and any other case involving the claims of each of LM, EW, and Jane Doe against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights,

photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein.

7. A copy of all documents, including, without limitation, checks, wire transfer instructions, wire transfer confirmations, bank statements, email confirmations, Notices of Distribution and other documents, reflecting any and all payments or distributions made by you, any law firm through which you provided legal services and/or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL regarding the proceeds of settlement paid by Jeffrey Epstein in connection with the claims of LM, EW, and Jane Doe against Jeffrey Epstein, including, without limitation, payments or distributions made to or for the benefit of LM, EW or Jane Doe (including, without limitation, to any trusts or similar arrangements or accounts of which any of LM, EW, or Jane Doe were then beneficiaries), payments made to Paul Cassell, payments made to any other law firm or individual lawyer, payments made to investigators, consultants, advisors, or other professionals, payments made to other contractors and payments made to witnesses.

8. A copy of all documents, including, without limitation, checks, wire transfer instructions, wire transfer confirmations, bank statements, email confirmations, Notices of Distribution and other documents, reflecting in respect of the proceeds of settlement paid by Jeffrey Epstein in connection with the claims of LM, EW, and Jane Doe against him any and all amounts retained by or allocated to you, any law firm through which you then provided legal services, and/or Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL as reimbursement of costs and expenses or in payment for legal services rendered.

9. A copy of all documents reflecting payments by you, Rothstein, Rosenfeldt & Adler, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services and/or any other lawyer and/or law firm to L.M., E.W., Jane Doe, [REDACTED], any investigators, paraprofessionals, other attorneys, other contractors or persons (including, without limitation, witnesses, publicity agents, public relations firms, book publishers, authors, journalists, bloggers, reporters, literary agents, syndicators, newspaper publishers, film or television producers, news agencies, television networks, other media outlets or entities engaged in similar business), which payments in any way relate to any federal or Florida state cases against Jeffrey Epstein or any other claims against Jeffrey Epstein in which you or your clients were involved.

**10. A copy of all documents reflecting payments made to you, Rothstein, Rosenfeldt & Adler, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services and/or any other lawyer and/or law firm, or made to or for the benefit of L.M. E.W., Jane Doe, [REDACTED] [REDACTED] (nee Roberts), by any investigators, paraprofessionals, other attorneys, other contractors or other persons (including, without limitation, publicity agents, public relations firms, book publishers, authors, journalists, bloggers, reporters, literary agents, syndicators, newspaper publishers, film or television producers, news agencies, television networks, other media outlets or entities engaged in similar business), which payments in any way relate to any federal or Florida state cases against Jeffrey Epstein or any other claims or allegations against Jeffrey Epstein in which you or your clients were involved.**

46. Edwards offers the same boilerplate objection to Requests 2-10, claiming they are overly broad, seek information that is irrelevant and immaterial, not reasonably calculated to lead to the discovery of admissible evidence, requests attorney work product and attorney-client materials, and is protected by rights to financial privacy.

47. Edwards claims to have suffered losses in the form of injury to reputation; mental anguish, embarrassment and anxiety; fear of physical injury; loss of value of time required to be diverted from professional activities; and cost of defense.

48. These requests are all reasonably likely to lead to the discovery of admissible evidence on these damages issues. Edwards's financial privacy objection lacks merit because Edwards seeks damages relating to his alleged injury to those same finances (i.e. he was unable to devote more time to professional activities that allegedly caused him losses).

49. The Court should compel Edwards to produce all documents responsive to the request for production dated September 5, 2017.

**EXPERT WITNESS DISCOVERY DATED 10/13/17**

50. On October 13, 2017, Epstein served expert witness discovery on Edwards, which consisted of interrogatories and a request for production. A copy of the expert witness discovery is attached as Composite Exhibit D.

51. In the request to produce, Epstein sought customary expert disclosure information, including copies of depositions of Edwards's expert taken in other actions, reports rendered by Edwards' experts applicable to any issues in this case, correspondence between Edwards and any experts, documents furnished or made available to Edwards's expert, and documents considered or reviewed by Edwards's expert or upon which Edwards's expert relied in evaluating, investigating or formulating his or her opinions.

52. In response to this discovery, Edwards provided only a portion of the requested documentation and failed to provide a written response to the specific requests.

53. Instead, Edwards instructed Epstein:

**Please confirm receipt of the materials provided by Dropbox, and further confirm that these materials, together with Dr. Jansen's report and the information disclosed last week regarding Dr. Jansen, satisfy the expert witness discovery you recently propounded. If there is anything else you believe you need, please let me know with specificity what that is.**

54. Edwards's response to Epstein's expert discovery is inappropriate and insufficient.

55. First, Epstein cannot confirm that the materials fully satisfy the request for production because only Edwards knows the universe of responsive documents.

56. Second, upon review of the documents Edwards did provide, it appears that Edwards failed to provide documentation in response to several of the requests, including:

a. Copies of Jansen's deposition transcripts (RFP 1)

- b. Correspondence between Edwards's counsel and Jansen (RFP 3)
- c. Copies of all materials made available to Jansen (RFP 4)
- d. Copies of all materials Jansen relied upon (RFP 5)
- e. Any other information reviewed by Jansen (RFP 6)
- f. All documents or tangible items pertaining to the scope of Edwards's employment of Jansen and compensation for his services (RFP 7a)
- g. All documents or tangible items pertaining to the percentage of Jansen's income earned as an expert witness (RFP 7e)
- h. Records of payments made to Jansen by Edwards and his attorneys in the last ten years (RFP 8)
- i. Documents created by Jansen in connection with this case (RFP 10)
- j. Copies of Jansen's publications (RFP 11)
- k. Jansen's draft opinions (RFP 12)
- l. Jansen's fee schedule (RFP 13)
- m. Copies of Jansen's other expert reports (RFP 14)
- n. Copies of any orders pertaining to Jansen (including orders on Frye or Daubert motions) (RFP 15)
- o. Statement of Jansen's compensation, rate, amount paid to date, amount charged to date, and an estimate of the amount of time Jensen expects to spend on the case moving forward (Interrogatory 15a-b)
- p. The subject matter of Jensen's opinions in other cases (Interrogatory 16c)

57. Further, Edwards has failed to respond to all of the expert witness interrogatories.

58. Edwards's responses to the expert witness discovery served on October 13, 2017, are incomplete and insufficient. On the eve of trial, Epstein once again is being prejudiced by Edwards's refusal to provide relevant information pursuant to the discovery process. The Court should compel Edwards to provide responsive, full, and appropriate responses to the expert



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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via e-mail this \_\_\_\_ day of November, 2017 in accordance with Florida Rule of Judicial Administration 2.516 to:

Jack Scarola  
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