

# Tonja Haddad, PA

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[REDACTED]

June 26, 2012

## Via US and Electronic Mail

Jack Scarola, Esq.  
Searcy Denney *et al.*  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Re: *Epstein v. Edwards et al.*

Dear Mr. Scarola:

After a careful review of Scott Rothstein's Deposition testimony, the pleadings in this matter, the limited discovery we have received from you, and the current outstanding discovery requests (some of which the Court has yet to rule upon), please be advised of the following:

While we understand your position with respect to Rothstein's testimony as it relates to Mr. Edwards, we disagree that it somehow disposes of Mr. Epstein's claims, for at least two reasons. First, some of the information espoused by Rothstein concerning Mr. Epstein's cases while they were handled by RRA supports our standpoint in the pending litigation. For example, **[INSERT EXAMPLES]**.

Second, while Mr. Rothstein's testimony may provide one version of the underlying events at issue, corroborating evidence -- or the lack thereof -- will aid in determining whether that testimony is credible. But because you have refused, for over two years, to provide virtually any of the discovery we have requested, we have been and still are unable to further investigate and potentially re-evaluate our claims. Accordingly, we are again, in a good faith effort to further investigate and potentially resolve this matter, requesting copies of the electronic communications that have yet to be turned over. For the time being, I am willing to accept just those electronic communications in which Mr. Edwards was a party that relate to the July 21-23 meetings regarding my client's cases, as requested back in **[DATE/DOC REQUEST No.]** This set of documents is most likely to aid in further evaluation of this case. Given your firm belief in the truth of Mr. Rothstein's testimony, I anticipate that you will be amenable to finally fulfilling this long-outstanding request. Please advise whether you intend to comply with your discovery obligations in this regard and facilitate the potential resolution of these matters.

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Upon our review of the afore-referenced communications, we will determine whether it is necessary to schedule the continuation of Mr. Edwards' deposition. Please advise. Thank you.

Sincerely,  
TONJA HADDAD, PA

Tonja Haddad Coleman  
for the firm