

FOURTH DISTRICT COURT OF APPEAL
STATE OF FLORIDA

BRADLEY J. EDWARDS,

CASE NO.: 4D14-2282

L.T. Case No.: 502009CA040800

Appellant,

v.

JEFFREY EPSTEIN,

Appellee.

_____ /

MOTION FOR APPELLATE ATTORNEYS' FEES AND COSTS

Appellee, Jeffrey Epstein, moves for an order determining his entitlement to appellate attorneys' fees and costs pursuant to Section 768.79, Florida Statutes and Florida Rule of Civil Procedure 1.442. By order of February 3, 2015, the trial court has determined that Epstein is entitled to trial court fees and costs pursuant to Florida Statute Section 768.79 and Florida Rule of Civil Procedure 1.442. The amount of these fees and costs has not yet been determined. This award was based on the fact that Epstein filed a good faith Offer of Judgment which Edwards rejected. A copy of the February 3, 2015 order is attached. A copy of the Motion for Attorney's Fees and Costs with other relevant pleadings is also attached.

Epstein relies upon the case law cited in these documents along with the trial court's order citing cases. Also see Respiratory Care Services, Inc. v. Shear, 715 So. 2d 1054 (Fla. 5th DCA 1998), and cases cited therein. This court should

determine that Epstein is entitled to an affirmance of the final judgment below and also entitled to these fees and costs. The matter should be remanded for the trial court to determine the amount of the fees and costs.

I HEREBY CERTIFY that a copy of the foregoing has been furnished electronically to the following this _____ day March, 2015:

William B. King
Searcy Denny Scarola Barnhart
& Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
[REDACTED]

Philip M. Burlington
Burlington & Rockenbach, P.A.
Courthouse Commons/Suite 350
444 W. Railroad Avenue
West Palm Beach, FL 33401
[REDACTED]

Bradley J. Edwards
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, P.L.
425 N. Andrews Ave., Ste. 2
Ft. Lauderdale, FL 33301
[REDACTED]

Fred Haddad
Fred Haddad, P.A.
1 Financial Plaza, Ste. 2612
Ft. Lauderdale, FL 33301
[REDACTED]

Mark Nurik
Law Offices of Mark S. Nurik
1 E. Broward Blvd., Ste. 700
Ft. Lauderdale, FL 33301
[REDACTED]

Jack Goldberger
Atterbury, Goldberger & Weiss, P.A.
250 S. Australian Ave., Ste. 1400
West Palm Beach, FL 33401
[REDACTED]

W. Chester Brewer, Jr.
W. Chester Brewer, Jr. P.A.
250 S. Australian Ave., Ste. 1400
West Palm Beach, FL 33401
[REDACTED]

/s/ John Beranek
JOHN BERANEK
Fla. Bar No.: 0005419
AUSLEY & MCMULLEN, P.A.
123 South Calhoun Street
P.O. Box 391 (zip 32302)
Tallahassee, FL 32301
[REDACTED]
[REDACTED]
[REDACTED] (secondary)

/s/ Tonja Haddad Coleman
Tonja Haddad Coleman, Esq.
Florida Bar No.: 176737
Tonja Haddad, PA
5315 SE 7th Street
Suite 301
Fort Lauderdale, Florida 33301
[REDACTED]
[REDACTED]
[REDACTED]