

TONJA HADDAD, PA

524 South Andrews Avenue
Suite 200 North
Fort Lauderdale, FL 33301

July 12, 2012

Via US and Electronic Mail

Jack Scarola, Esq.
Searcy Denney *et al.*

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:

First, while we understand your position with respect to Rothstein's testimony as it relates to Brad Edwards, we disagree that it somehow disposes of Mr. Epstein's claims against Brad. Mr. Epstein's litigation against Edwards does not solely rely on Brad being involved in Scott's Ponzi Scheme, and while Scott may have testified that he did not order or instruct Brad to do certain things to further his Ponzi scheme, the fact remains that Brad did engage in behaviors consistent with Mr. Epstein's claims. For instance, the fact that Brad deposed prominent celebrities without asking questions relevant to his cause of action; threatened in the press to depose other prominent and influential people who had absolutely nothing to do with his Clients' underlying case; and continually makes allegations of illegal sexual acts occurring on Mr. Epstein's airplane- an accusation that even Brad's own clients have repeatedly and irrefutably denied. These are just a few of the facts that we believe support the pending claims against Edwards.

Second, while 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. However, because you have refused, for over two years, to provide virtually any of the discovery we have requested we have been, and are still 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. 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.

Finally, 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