

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

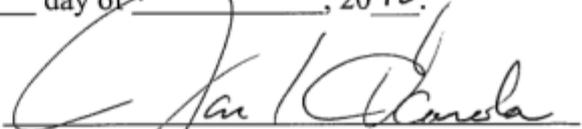
MOTION TO FILE AMENDMENT TO THIRD AMENDED COUNTERCLAIM

Counter-plaintiff, BRADLEY J. EDWARDS, by and through his undersigned counsel, moves this Honorable Court to permit the filing of the accompanying Amendment to the Third Amended Counterclaim and in support thereof would show that on the eve of the summary judgment hearing scheduled to address Plaintiff, JEFFREY EPSTEIN'S, abuse of process claim against EDWARDS, EPSTEIN voluntarily dismissed that claim, bringing all claims against EDWARDS to a conclusion. The circumstances of that dismissal constitute a bona fide termination of the claim in EDWARDS' favor and provide the basis for the expansion of EDWARDS' currently pending malicious prosecution claims to encompass that recent development.

WHEREFORE, EDWARDS seeks leave to file the proposed Amendment and Order directing EPSTEIN's expedited response.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to File Amendment to Third Amended Counterclaim

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 24th day of AUGUST, 2012.



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Defendant,

AMENDMENT TO THIRD AMENDED COUNTERCLAIM

Counter-plaintiff, BRADLEY J. EDWARDS, hereby amends the Third Amended Counterclaim by striking Paragraph 32 and substituting the following:

32. After unsuccessful efforts to defend and amend his maliciously filed and prosecuted claims over a period of almost two years, EPSTEIN, abandoned each of the claims described in Paragraph 27. The dismissal of the claims occurred in response to EDWARDS' challenges because there was not and never had been a factual basis to support any of the claims and because EPSTEIN never had probable cause or a reasonable basis to support the allegations he made against EDWARDS. He also knew from the outset of his claims against EDWARDS that the litigation privilege and the sword-shield doctrine each constituted a complete bar and insurmountable obstacle to the successful prosecution of any and all of his claims. His abandonment of all claims against EDWARDS brings to successful conclusion EDWARDS' defense against each of the other abandoned claims and constitutes a specific bona fide termination in EDWARDS' favor of the prior prosecution of each abandoned claim.

Edwards adv. Epstein
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Amendment to Third Amended Counterclaim
Page 2 of 3

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