

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs,

v.

DERSHOWITZ,

Defendant.

**DEFENDANT / COUNTERCLAIM PLAINTIFF ALAN DERSHOWITZ'S
FIRST SET OF DOCUMENT REQUESTS TO
PLAINTIFF / COUNTERCLAIM DEFENDANT BRADLEY J. EDWARDS**

Defendant / Counterclaim Plaintiff Alan Dershowitz ("Dershowitz") requests that Plaintiff / Counterclaim Defendant Bradley J. Edwards ("Edwards"), pursuant to Fla.R.Civ.P. 1.350, produce for inspection and/or copying, at the offices of undersigned counsel, the documents and things listed on Schedule "A" below.

GENERAL INSTRUCTIONS

1. The following requests are intended to cover all documents in the possession of Edwards, to whom these requests are directed, or all documents subject to his custody or control, wherever they may be located.
2. Each production request is to be responded to separately and as thoroughly as possible. The fact that investigation is continuing or that discovery is not complete shall not be used as an excuse for failure to respond to each request as fully as possible. The omission of any document, thing or item of information shall be deemed a representation that such document is not known to Edwards, his counsel, or other representatives at the time of the service of the response.
3. If the attorney/client privilege or a work product protection is asserted in response to any production request, identify the document by its:
 - (a) date;

- (b) general nature, *e.g.*, letter, memorandum, photograph, computer printout, etc.;
- (c) subject matter;
- (d) author or originator;
- (e) each person indicated as an addressee or copy recipient, or known or believed by you to have received a copy of the document;
- (f) present custodian of each copy of the document;
- (g) alleged ground or grounds for withholding production; and
- (h) sufficient particulars to allow Dershowitz to evaluate the claim of privilege or immunity asserted.

DEFINITIONS

As used in these Requests for Production, the following definitions shall apply:

1. "All" and "Each" mean all, each, any, and every.
2. "Cassell" means Plaintiff / Counterclaim Defendant Paul G. Cassell.
3. "Complaint" means the complaint filed by Edwards and Cassell in this action.
4. "Concerning" and "Concern" mean relates to, refers to, contains, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts, and contradicts.
5. "Dershowitz" means Alan M. Dershowitz.
6. "Document(s)" means any and All written, typed, printed, recorded or graphic matter, however produced, reproduced or stored, whether an original or a copy, and whether prepared, published or released by any person or entity, including but not limited to letters, reports, agreements, correspondence, intra-office or inter-office correspondence, telegrams, minutes or records of meetings, reports or summaries, expressions or statements, lists, drafts and revisions, invoices, receipts, original and preliminary notes, sketches, records, ledgers, contracts, bills of lading, bills, inventories, financial data, maps, memoranda, accounting and financial records, diaries, journals, calendars, statements, work papers, videotapes, photographs, pamphlets, brochures, advertisements, trade letters, press releases, drawings, recaps, tables, articles, summaries of conversations, computer cards, tapes, diskettes, or other means of electronically or magnetically maintaining information, and printouts.

The term "Document(s)" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term

“Document(s)” includes All drafts of a Document and All copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems), together with instructions and All other materials necessary to use or interpret such data compilations.

Without limitation on the term “control” as used in the preceding paragraph, a Document is deemed to be in Your control if You have the right to secure the Document or a copy thereof from another person.

7. “Edwards,” “You” and “Your” means Bradley J. Edwards.
8. “Epstein” means Jeffrey Epstein.
9. “Federal Action” means the matter styled *Jane Doe #1, et al. v. United States of America*, Case No. 08-80736-CIV-MARRA/JOHNSON (S.D. Fla.).
10. “Jane Doe # 3” means the individual referred to as “Jane Doe #3” in the Federal Action.
11. “Joinder Motion” means the “Jane Doe #3 And Jane Doe #4’s Motion Pursuant To Rule 21 For Joinder In Action” filed in the Federal Action.
12. “NPA” means the non-prosecution agreement between Epstein and the United States Attorney’s Office for the Southern District of Florida.
13. “Plaintiffs” means Plaintiff / Counterclaim Defendant Bradley J. Edwards and Plaintiff / Counterclaim Defendant Paul G. Cassell.
14. “2015 Jane Doe #3 Declaration” means the Declaration of Jane Doe #3 filed in the Federal Action on January 21, 2015 as Docket Entry #291-1.

SCHEDULE "A"

DOCUMENT REQUESTS

1. All Documents Concerning the alleged "character assassination" referenced in paragraph 8 of the Complaint.
2. All Documents Concerning Dershowitz's alleged "participation in Epstein's criminal conduct" referenced in paragraph 16 of the Complaint.
3. All Documents Concerning Dershowitz's alleged knowledge that the filing referenced in paragraph 17 of the Complaint was "an entirely proper and well-founded pleading."
4. All Documents Concerning the alleged "massive public media assault" referenced in paragraph 17 of the Complaint.
5. All Documents Concerning the "multiple national televised interviews," "statements to and repeated by national and international print news sources" and "various other forms nationally and internationally" alleged in paragraph 19 of the Complaint.
6. All Documents Concerning the allegation in paragraph 20 of the Complaint that Dershowitz's "statements were false and known by him to be false at the time they were made."
7. All Documents Concerning the allegation in paragraph 21 of the Complaint that Dershowitz falsely protested his own innocence.
8. All Documents Concerning Dershowitz's alleged "involvement in Epstein's criminal conduct" as alleged in paragraph 21 of the Complaint.
9. All Documents that reference Dershowitz by name that Concern the allegations set forth in Paragraphs 24-31 of the 2015 Jane Doe #3 Declaration.
10. All Documents Concerning drafts of any declaration or affidavit of Jane Doe #3.
11. All photographs and video in the original, native format in which they were taken (not a paper copy) of Jane Doe #3 with Dershowitz.
12. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to any prior Request, of Dershowitz at (i) Epstein's Manhattan home in New York City, New York; (ii) Epstein's home in Palm Beach, Florida; (iii) Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Epstein's airplane, on the same date and time that Jane Doe #3 also was present at such location.

13. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to any prior Request that evidence and/or show Jane Doe #3 was present at the same location as Dershowitz on that same date and time.
14. All Documents Concerning Jane Doe #3's presence at the various locations named in Paragraphs 24-31 of the 2015 Jane Doe #3 Declaration on the particular dates and times when Dershowitz was also present.
15. All Documents Concerning whether Dershowitz was present at the various locations named in Paragraphs 24-31 of the 2015 Jane Doe #3 Declaration on the particular dates and times when Jane Doe #3 alleges to have been present.
16. All statements, written or recorded, that Plaintiffs or Jane Doe #3 have provided to anyone that reference Dershowitz by name.
17. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of Jane Doe #3 on the dates on which Jane Doe #3 allegedly was present with Dershowitz, including but not limited to any diary, journal, or calendar entries on those dates, regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).
18. All notes of, or notes prepared for, any statements or interviews in which Plaintiffs or Jane Doe #3 referenced Dershowitz by name or other description.
19. All Documents Concerning communications between You or anyone acting on Your behalf and anyone from, or acting on behalf of, any media outlet Concerning Dershowitz or this action, whether or not such communications were "on the record" or "off the record."
20. All Documents Concerning any press release Concerning this action, the Joinder Motion, or Dershowitz, or Jane Doe #3.
21. All Documents Concerning any assertion that Dershowitz was a "co-conspirator" with Epstein.
22. All Documents Concerning any assertion that Dershowitz negotiated the NPA for his own benefit.
23. All Documents Concerning any actions allegedly taken by Prince Andrew, Duke of York, to influence the terms of the NPA.
24. All Documents Concerning any request for the deposition of Dershowitz.
25. All Documents Concerning any investigation of Dershowitz.
26. All notes of any investigation of Jane Doe #3's allegations against Dershowitz.

27. All telephone records, including but not limited to records for any cell phone, for any telephone used by Jane Doe #3 between January 1, 1999 and December 31, 2002.
28. All Documents Concerning Jane Doe #3's diary or journal.
29. All Documents Concerning any actual or potential book, television, movie or other media deals Concerning Jane Doe #3's allegations about being a sex slave.
30. All Documents Concerning Your retainer agreement with Jane Doe #3.
31. All Documents Concerning any investigation of Jane Doe #3.
32. All Documents identified in Your responses to Dershowitz's First Set of Interrogatories to You in this action.
33. All Documents Concerning Your claim for damages in this action.
34. All Documents referred to or relied upon by Plaintiffs to prepare "Jane Doe #3 and Jane Doe #4's Motion Pursuant to Rule 21 for Joinder in Action," which was filed in the Federal Action as Docket Entry #279.
35. All Documents referred to or relied upon by Plaintiffs to prepare the Complaint in this action.

Dated: February 11, 2015

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Respectfully submitted,

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Counsel for Alan M. Dershowitz

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-mail on **February 11, 2015** to: Jack Scarola, Esquire, Searcy Denny et al [REDACTED] and [REDACTED], counsel for Plaintiff and to Kendall B. Coffey, Esquire, Coffey Burlington, [REDACTED], [REDACTED] and [REDACTED].

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