

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION
CASE NO. 502009CA040800XXXXMBAG
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually and
BRADLEY J. EDWARDS, individually,
and L.M., individually,

Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S RESPONSE TO
DEFENDANT/COUNTER-PLAINTIFF BRADLEY J. EDWARDS' REQUEST FOR
PRODUCTION SERVED JUNE 9, 2011**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.350, of the Florida Rules of Civil Procedure, files this his Response to the Request for Production from the Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards"), Request for Production Served June 9, 2011, and would state as follows:

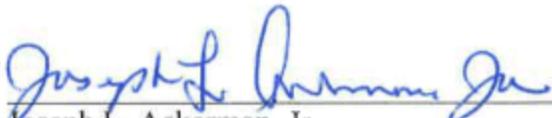
1. Since Epstein has not be able, due in large part to the objections of Edwards to obtain all relevant documents that would reflect, suggest, or relate to Edwards' knowledge of Rothstein's conduct, it is not possible to to produce all documents responsive to this request. However, exhibits to the deposition of A.J. Discala, Dean Kretschmar, and Michael Legamaro due fit and are responsive to this request. In addition, the documents that are exhibits to Epstein's Motion to Use Confidential Documents are also responsive.
2. See Response to Number 1 above.
3. Undetermined at this time.

4. Objection. Work product. *See Grinnel Corp. v. Palms 2100 Ocean Boulevard Limited*, 924 So 2d 887 (Fla. 4th DCA 2006).

5. Objection. Work product. *See Grinnel Corp. v. Palms 2100 Ocean Boulevard Limited*, 924 So 2d 887 (Fla. 4th DCA 2006).

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 14th day of July, 2011 to: Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, ■■■, 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; Jack Scarola, Esq., Searcy Denney Scarola et al., 2139 Palm Beach Lakes Boulevard, P.O. Drawer 3626, West Palm Beach, FL 33409; and Martin G. Weinberg, Esq., 20 Park Plaza, Suite 1000, Suffolk, MA 02116.

Respectfully submitted,



Joseph L. Ackerman, Jr.

Fla. Bar No. 235954

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