

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
L.M., individually,

Defendant(s).

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REQUEST TO PRODUCE TO JEFFREY EPSTEIN

Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Jeffrey Epstein produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

Any and all documents* reflecting or relating to any expenditure of time, effort or money by you or on your behalf to influence directly or indirectly your public image or reputation including but not limited to:

1. expenditures directed at overcoming, counter-balancing, or suppressing adverse media attention focused on any criminal charges lodged against you;
2. communications relating to your desire for privacy or confidentiality;