

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

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and  
PAUL G. CASSELL,

Plaintiffs/Counterclaim Defendants,

vs.

ALAN M. DERSHOWITZ,

Defendant/Counterclaim Plaintiff.

\_\_\_\_\_ /

**DEFENDANT/COUNTERCLAIM PLAINTIFF ALAN DERSHOWITZ'S  
FOURTH 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" or "You"), pursuant to Fla. R. Civ. P. 1.350, produce for inspection and/or copying, at the offices of undersigned counsel, the following documents:

1. All documents\* concerning\*\* any written or oral statements [REDACTED] [REDACTED] made to the Federal Bureau of Investigation ("FBI"), including but not limited to the statement cited by your counsel, Jack Scarola, in the October 15, 2015 deposition of Dershowitz in the following line of questioning:

**Mr. Scarola:** Do you have a copy of the statement that [REDACTED] [REDACTED] made to the FBI?  
**Mr. Dershowitz:** I don't have it here, no.  
**Mr. Scarola:** Have you seen it?  
**Mr. Dershowitz:** Her statement to the FBI?  
**Mr. Scarola:** Yes.

— See Dershowitz Deposition, Oct. 15, 2015, Volume I, Page 113, Lines 17-22.

- \* “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.

- \*\* “Concerning” means relates to, refers to, contains, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts, and contradicts.

Respectfully submitted,

/s/ Steven R. Safra

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*Counsel for Alan M. Dershowitz*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing has been electronically filed through the Clerk of Broward County by using the Florida Courts eFiling Portal and thus served by electronic mail (email) at email address: [REDACTED], [REDACTED], [REDACTED] to: **Jack Scarola, Esq.**, Searcy Denney Scarola Barnhart & Shipley, P.A., Counsel for Plaintiff, 2139 Palm Beach Lakes Blvd., West Palm Beach, Florida 33409, as well as [REDACTED] to: **Joni J. Jones, Esq.**, Assistant Utah Attorney General, Counsel for Plaintiff Cassell, 160 East 300 South, Salt Lake City, Utah 84114, as well as [REDACTED] to: **Sigrid McCawley, Esq.**, Boies, Schiller & Flexner LLP, 401 East Las Olas Blvd., Suite 1200, Fort Lauderdale, Florida 33301, this 11th day of December, 2015.

By: s/Steven R. Safra  
STEVEN R. SAFRA  
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