

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

MEMORANDUM IN SUPPORT OF BRADLEY J. EDWARDS'
MOTION FOR PROTECTIVE ORDER

Bradley Edwards has moved for protection against the discovery of personal financial information sought by Jeffrey Epstein in discovery. Epstein supports his broad ranging requests on the grounds that the information sought is reasonably calculated to lead to admissible evidence regarding the economic loss Mr. Edwards claims to have suffered as a consequence of the tortious conduct to which Epstein subjected him. To justify his attempted broad intrusion into Mr. Edwards' economic privacy, the economic privacy of Mr. Edwards' law firm, and the economic privacy of Mr. Edwards' clients, Epstein misrepresents, mischaracterizes, or simply fails to understand the nature of the losses Mr. Edwards is claiming.