

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

JEFFREY EPSTEIN,

CASE NO.: 502009CA040800XXXXMBAG

Plaintiff,

vs.

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

Defendants.

**COUNTER-PLAINTIFF EDWARDS' MOTION TO OVERRULE
COUNTER-DEFENDANT EPSTEIN'S OBJECTIONS
AND TO COMPEL ANSWERS TO INTERROGATORIES**

Counter-Plaintiff, Bradley Edwards ("Edwards"), pursuant to Florida Rule of Civil Procedure 1.380, moves for an order overruling the blanket attorney-client privilege objections raised by Counter-Defendant, Jeffrey Epstein ("Epstein"), in answers to interrogatories, and compelling Epstein to answer the interrogatories, and states:

Background

1. Epstein is a convicted felon for having engaged in illicit sexual activity with numerous underaged girls over a period of years.
2. Edwards represented three of Epstein's victims in connection with criminal investigations and civil lawsuits.
3. In an effort to avoid compensatory and punitive damage liability, to deter cooperation in the ongoing criminal investigations, and to intimidate his victims and their