

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
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CASE NO.: 09-34791-RBR  
Chapter 11

IN RE:

ROTHSTEIN ROSENFELDT ADLER, P.A.,

Debtor.

**JOINT EX PARTE MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**  
**(Expedited Relief Requested)**

Herbert Stettin, the Chapter 11 Trustee ("Trustee") of the Debtor, Rothstein RosefeldtAdler, P.A. ("RRA"), and Jeffrey Epstein, by and through this undersigned counsel, Fowler White Burnett, move for the entry of Stipulated Protective Order ("Stipulated Protective Order") by and between the Trustee and Mr. Epstein's counsel, attached hereto as Exhibit "A", and in support thereof state:

1. Pursuant to this Court's Order Granting Trustee's Motion Seeking a Protective Order and Approving Proposed Document Production Protocol "(Order)" [D.E. #672], the Trustee and Mr. Epstein, through counsel, jointly move for the entry of the Stipulated Protective Order.

2. The Trustee and Mr. Epstein, through counsel, request that the Stipulated Protective Order be entered without a hearing as the relief requested herein is in compliance with the Court's Order.

3. The Trustee and Mr. Epstein, through counsel, are requesting expedited relief so that Creditors can quickly begin the process of reviewing and analyzing voluminous information.

WHEREFORE, the Trustee and Mr. Epstein, through counsel, jointly move for the entry of

the Stipulated Protective Order by and between Trustee and Mr. Epstein, through counsel, attached hereto as Exhibit "A", and for any and all other relief this Court deems just and equitable.

Dated: \_\_\_\_\_ day of June, 2010

Respectfully Submitted.

By: \_\_\_\_\_

Lilly Ann Sanchez, FBN 195677  
Christopher E. Knight, FBN 607363  
Joseph L. Ackerman, Jr., FBN 235954  
Rodney J. Janis, FBN 647896  
FOWLER WHITE BURNETT P.A.  
901 Phillips Point West  
777 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone: (561) 802-9044  
Facsimile: (561) 802-9976

By: \_\_\_\_\_

Charles H. Lichtman FBN 501050  
BERGER SINGERMAN  
Counsel for the Chapter 11 Trustee  
350 East Las Olas Blvd., 10<sup>th</sup> Floor  
Ft. Lauderdale, Florida 33301  
Telephone: (954) 525-9900  
Fax: (954) 523-2872

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been furnished via the Court's CM/ECF electronic noticing system all electronic filing participants with respect to this proceeding, this \_\_\_ day of June, 2010. I also certify that the foregoing document is being served this \_\_\_ day of June, 2010 by U.S. Mail to all parties listed on the service list below, and who are not registered to receive Notice of Electronic Filing in this case.

\_\_\_\_\_  
Charles H. Lichtman, Esquire

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- John G. Bianco III [REDACTED]
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- Francis L. Carter [REDACTED]
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- Robert C Furr [REDACTED]
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- Michael I Goldberg [REDACTED]
- Lynn Maynard Gollin [REDACTED]
- Jordi Guso [REDACTED]
- Phillip M. Hudson III [REDACTED];hpiloto@arnstei
- Isaac M Marcushamer [REDACTED]
- Arthur C. Neiwirth [REDACTED]
- Office of the US Trustee USTPRegion21.MM.ECF@usdoj.gov
- Patricia A Redmond [REDACTED]
- Jeffrey C. Roth [REDACTED]
- William G Salim Jr [REDACTED]
- Reggie David Sanger [REDACTED]
- Steven D Schneiderman [REDACTED]
- Michael D. Seese [REDACTED]
- Bradley S Shraiberg [REDACTED];lrosetto@sfl-
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Suite 300  
Chicago, IL 60661

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