

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

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
individually, and [REDACTED] individually,

Defendants.

REPLY TO AFFIRMATIVE DEFENSES OF DEFENDANT, [REDACTED]

Plaintiff, JEFFREY EPSTEIN, (hereinafter "EPSTEIN"), by and through his undersigned attorneys, responds to the affirmative defenses and denies each and every allegation therein, and demands strict proof thereof. Specifically, the Defendant, L.M., has failed to set forth any facts which would support an estoppel and/or waiver argument in its affirmative defense and those defenses should therefore be stricken.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S.

Mail to the following addressees on this 12th day of January, 2010:

Gary M. Farmer, Jr., Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
954-524-2820
954-524-2822 – fax
Attorneys for Defendant, L.M.

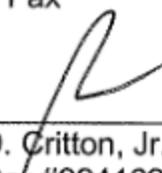
Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax: 561-835-8691
Co-Counsel for Defendant Jeffrey Epstein

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart &
Shipley, P.A

2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
686-6300
383-9424 F
Attorneys for Defendant Bradley Edwards

BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401
(561) 842-2820
(561) 253-0164 Fax

By: _____


Robert D. Critton, Jr.
Florida Bar #224162
Michael J. Pike
Florida Bar #617296

(Counsel for Defendant Jeffrey Epstein)