

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

MOTION TO DISMISS SECOND AMENDED COMPLAINT

Defendant/Counter-plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court to dismiss the Second Amended Complaint against him for failure to state a cause of action and in support thereof would show:

1. the "Introduction" to the Second Amended Complaint is nothing more than conclusory surplusage apparently intended to defame Mr. Edwards under the protection of the litigation privilege;

2. Except for the filing of a federal complaint that did not name Epstein and was apparently never served on him,* the Amended Complaint fails to identify the "process" alleged to be abusive, on whom it is claimed to have been served, or when it is claimed to have been served;

*Paragraph 30(b) of the Second Amended Complaint references a federal civil action with which "Edwards was never served." Presumably, since the complaint is alleged to have been filed by Edwards, the allegation was meant to have referenced Epstein rather than Edwards.

Edwards adv. Epstein
Edwards' Motion to Dismiss Second Amended Complaint
Case No.: 502009CA040800XXXXMBAG

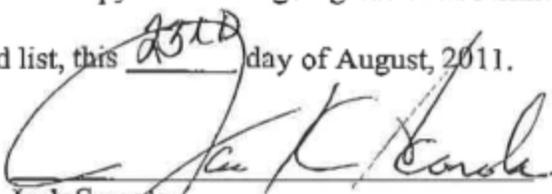
3. the Amended Complaint fails to articulate a cognizable theory of damages proximately caused by any wrongdoing on the part of Bradley J. Edwards;

4. the Amended Complaint fails to identify any conduct outside the protection of the litigation privilege which could give rise to any liability on the part of Bradley J. Edwards;

5. all legal arguments and authorities as contained in the Defendant's previously filed Motion for Summary Judgment and Motion to Assert Claim for Punitive Damages are incorporated herein by reference.

WHEREFORE, BRADLEY J. EDWARDS, demands dismissal of the Second Amended Complaint against him.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 23rd day of August, 2011.


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