

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  
█, individually,

Defendant,

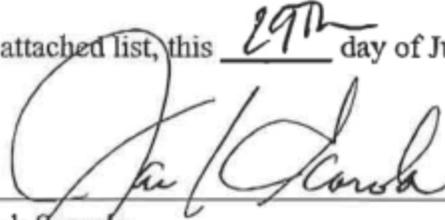
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**SUPPLEMENT TO BRADLEY EDWARDS' PROFFER IN SUPPORT OF MOTION  
FOR LEAVE TO AMEND TO ASSERT CLAIM FOR PUNITIVE DAMAGES**

Bradley J. Edwards, by and through his undersigned counsel, files the attached Response to Edwards' Request for Production served June 9, 2011, and the Request which demonstrates that Epstein does not have and has never had any documentary support for his contention that Edwards had knowledge about Rothstein's commission of or attempt to commit any fraud prior to the public disclosure of Rothstein's criminal conduct. The only documents referenced in response to the request for production provide no support for any claim asserted by Epstein against Edwards.

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Supplement to Bradley Edwards' Proffer in Support of  
Motion for Leave to Amend to Asscrt Claim for Punitive Damages  
Page 2 of 3

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 29<sup>th</sup> day of July, 2011.



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Attorneys for Bradley J. Edwards

Case No.: 502009CA040800XXXXMBAG  
Supplement to Bradley Edwards' Proffer in Support of  
Motion for Leave to Amend to Assert Claim for Punitive Damages  
Page 3 of 3

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IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION  
CASE NO. 502009CA040800XXXXMBAG  
Judge David F. Crow

JEFFREY EPSTEIN,  
Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually and  
BRADLEY J. EDWARDS, individually,  
and [REDACTED], individually,  
Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S RESPONSE TO  
DEFENDANT/COUNTER-PLAINTIFF BRADLEY J. EDWARDS' REQUEST FOR  
PRODUCTION SERVED JUNE 9, 2011**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.350, of the Florida Rules of Civil Procedure, files this his Response to the Request for Production from the Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards"), Request for Production Served June 9, 2011, and would state as follows:

1. Since Epstein has not be able, due in large part to the objections of Edwards to obtain all relevant documents that would reflect, suggest, or relate to Edwards' knowledge of Rothstein's conduct, it is not possible to to produce all documents responsive to this request. However, exhibits to the deposition of A.J. Discala, Dean Kretschmar, and Michael Legamaro due fit and are responsive to this request. In addition, the documents that are exhibits to Epstein's Motion to Use Confidential Documents are also responsive.
2. See Response to Number 1 above.
3. Undetermined at this time.

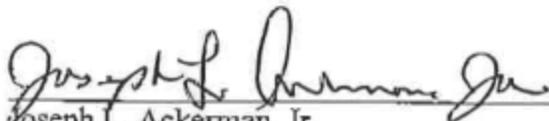
Epstein v Rothstein, et al.  
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Epstein's Response to Edwards' RFP Served June 9, 2011

4. Objection. Work product. *See Grinnel Corp. v. Palms 2100 Ocean Boulevard Limited*, 924 So 2d 887 (Fla. 4<sup>th</sup> DCA 2006).

5. Objection. Work product. *See Grinnel Corp. v. Palms 2100 Ocean Boulevard Limited*, 924 So 2d 887 (Fla. 4<sup>th</sup> DCA 2006).

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 14<sup>th</sup> day of July, 2011 to: Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, ■■■, 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; Jack Scarola, Esq., Searcy Denney Scarola et al., 2139 Palm Beach Lakes Boulevard, ■■■ Drawer 3626, West Palm Beach, FL 33409; and Martin G. Weinberg, Esq., 20 Park Plaza, Suite 1000, Suffolk, MA 02116.

Respectfully submitted,

  
Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954

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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  
█, individually,

Defendant(s).

PLAINTIFFS' REQUEST FOR PRODUCTION TO JEFFREY EPSTEIN

Defendant/Counterplaintiff, Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff/Counterdefendant, Jeffrey Epstein, produce and permit Bradley J. Edwards to inspect and copy each of the following documents\*:

1. Any and all documents\* reflecting, relating to, or suggesting that Edwards had knowledge about Rothstein's commission of or attempt to commit any fraud prior to the public disclosure of Rothstein's criminal conduct.
2. Any and all documents\* which in any way support the claim or claims that Epstein is pursuing against Edwards.
3. All emails that Epstein intends to use or may use as a trial exhibit.
4. All documents\* that rebuts, refutes, and/or contradicts the claims Epstein is pursuing against Edwards.

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5. Statements from anyone that in any way support the claims Epstein is pursuing against Edwards.

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, ■■■, 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Request for Production to Jeffrey Epstein

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 9<sup>th</sup> day of June, 2011.



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Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Request for Production to Jeffrey Epstein

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