

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  
[REDACTED], individually,

Defendant,

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**REQUEST FOR PRODUCTION TO COUNTER-DEFENDANT**  
**(PUNITIVE DAMAGES)**

BRADLEY J. EDWARDS, by and through his undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.350, hereby requests Production from JEFFREY EPSTEIN of the documents and things described below for the purpose of inspection, copying, photographing, testing or sampling and any other purposes permitted under the Florida Rules of Civil Procedure at the office of the undersigned within thirty (30) days of service of this request.

**DEFINITIONS AND INSTRUCTIONS:**

A. The term "documents" as used in this Request is defined as including, but not limited to, the original and any non-identical copy (which is different from the original because of notations on such copy or otherwise) of all correspondence, telegrams, teletype messages, contracts (including drafts, proposals and any and all exhibits thereto), draft minutes and addenda, memoranda (including inter and intra office memoranda), memoranda for file, pencil jottings, diary entries, desk calendar entries, reported recollections and other written form of

notation of events or intentions, transcripts and recordings of conversations and telephone calls, books, records, photographs, reports, tabulations, charts, books of account, ledgers, invoices, financial statements, purchase orders, receipts, canceled checks and other documentary material not subject to attorney/client privilege, together with any documents thereto, or enclosures therewith. The term "document" shall include data stored, maintained or organized electronically or magnetically through computer equipment, translated, if necessary, by you into comprehensible form.

The term "document" includes the complete file or files within which any items constituting a "document" are found, including all such files within your possession, custody or control wherever located, including any branch, local or main offices, and including not only the contents of such files but also the folder, jacket, envelope or other container in which the file is kept or stored.

Each draft, final document, original, reproduction, and each signed and unsigned document and every additional copy of such document where such copy contains any commentary, note, notation or other change whatsoever that does not appear on the original or on the copy of the one document produced shall be deemed and considered to constitute a separate document.

B. As used herein, the following words shall have the meanings indicated:

- (i) "Plaintiffs" in addition to the Plaintiffs named in the full style of this action, shall include any attorney, officer, director, employee or agent of

Plaintiffs or any other persons acting under Plaintiffs' control or supervision, or in concert or association with Plaintiffs.

- (ii) "Defendant", in addition to the Defendant named in the full style of this action, shall include any attorney, officer, director, employee or agent of the Defendant or any other persons acting under Defendant's control or supervision, or in concert or association with the Defendant.
- (iii) "You" shall include the person (as defined below) or party to whom this Request is addressed and additionally all of his/her/its agents, officers, directors, employees, and other persons acting or purporting to act on his/her/its behalf, and includes also, to the extent there is no actual privilege, his/her/its attorneys.
- (iv) "Person" means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units herein, and shall include, but not be limited to, public or private corporations, partnerships, joint ventures, voluntary or unincorporated associations, organizations, proprietorships, trusts, estates, governmental agencies, commissions, bureaus, or departments, and the agents, servants and employees of same.
- (v) "Concerning" includes referring to, responding to, relating to, connected with, regarding, discussing, analyzing, showing, describing, reflecting, employing and constituting.

- (vi) "Evidencing" means having a tendency to show, prove, or disprove.
- (vii) "Communication" means any oral or written statement, dialogue, colloquy, discussion or conversation, and also means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.
- (viii) "Including" shall mean including but not limited to.
- (ix) The words "and" and "or" as used herein shall be construed either disjunctively or conjunctively as required by the context to bring within the scope of this production request any answer that might be deemed outside its scope by another construction.
- (x) "Related to" or "relating to" shall mean directly or indirectly, refer to, reflect, describe, pertain to, arise out of or in connection with, or in any way legally, logically, or factually be connected with the matter discussed.

C. This Request calls for production of all responsive documents in your possession, custody or control without regard to physical location of said document.

Control means in your possession, custody or control or under your direction, and includes in the possession, custody or control of those under the direction of you and your employees, subordinates, counsel, accountant, consultant, expert, parent or affiliated corporation, and any person purporting to act on your behalf.

D. All documents shall be originals unless otherwise indicated. If your original is a photocopy or other copy, then the photocopy shall be produced as the original.

E. Unless another time period is specified, this Request is addressed to documents created in the past five years from the date of this Request, and ending on the date of compliance with this Request.

F. If you possess no documents responsive to a paragraph in this Request, state this fact, specifying the paragraph concerned.

G. If you object in part to any Request, produce the portion of the documents requested to which you do not object, and state your objections to the remainder.

H. As required by Florida Rule of Civil Procedure 1.280(b)(5), if you (including your attorneys and agents) are withholding information otherwise discoverable under these rules by claiming that it is privileged or subject to protection as trial preparation material, you (including your attorneys and agents):

(i) Shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing the information itself privileged or protected, will enable the party seeking discovery through this Request to assess the applicability of the privilege or protection.

(ii) Provide a brief description of the document, including (a) the date of the document; (b) number of pages, attachments and appendices; (c) the names of its author, authors, preparers and an identification by employment and title of each

such person; (d) the name of each person who has sent, shown, or blind carbon copies of the documents, or has had access to or custody of the documents, together with an identification of each such person, and (e) in the case of any document relating or referring to a meeting or conversation, an identification of such meeting or conversation.

I. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope hereof any documents which might otherwise be construed to be outside the scope hereof.

#### **CONTINUING REQUEST**

This is a continuing request for the production of documents to the extent allowed by Florida Rule of Civil Procedure 1.280(e). At such time as you become aware of the existence of any additional documents responsive to this Request so that your response was not complete when made, you are hereby requested to produce such documents promptly.

#### **DESTROYED DOCUMENTS**

If any documents responsive to this Request were at one time in existence, but have been lost or destroyed, a list should be provided of the documents so lost or destroyed stating the following information for each such document: (a) the type of document; (b) the date on which it ceased to exist, (c) the circumstances of its loss or destruction; (d) the identity of all persons having knowledge; and (e) the identity of all persons having knowledge of its contents.

### **MANNER OF PRODUCTION**

Pursuant to Rule 1.350, you should produce the original documents in the form, order and manner in which they are maintained in your files or the files of other persons under your control. In this connection, and for purposes of illustration, documents are to be produced in the file folder and file cartons in which they have been maintained or stored, clipped, stapled or otherwise arranged in the same form and manner as they were found. In the alternative, you should segregate all documents according to the specifications of this Request, and should organize and label each group of documents with the appropriate specifications prior to production. If any document is responsive to more than one specification of this Request, it should be labeled to reflect each specification to which it is responsive.

### **REQUESTS FOR PRODUCTION**

1. Please produce all Financial Statements prepared for or submitted to any Lender or Investor for the past five (5) years by you personally or on your behalf or on behalf of any entity in which you hold a controlling interest.
2. Please produce the W-2's and any other documents reflecting any income (including salary, bonuses, dividends, profit distributions, and any other form of income), including all gross and net revenue received by you directly or indirectly for the past five (5) years.
3. All tax returns filed with any taxing entity during the past five (5) years by you or on your behalf, or on behalf of any entity in which you hold or held a controlling interest at the time of filing.

4. All bank statements or other financial statements which were prepared by or received by you, or on your behalf or by or on behalf of any entity in which you had an ownership interest of 10% or more at any time during the past five (5) years.

5. All financial statements which were prepared by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 10% or more at any time during the past five (5) years.

6. The deeds and titles to all real property owned by you or held on your behalf either directly or indirectly at any time during the past five (5) years.

7. All passbooks with respect to all savings accounts, checking accounts and savings and loan association share accounts owned by your or on which you hold a right or have a held a right to withdraw funds at any time during the past five years.

8. All passbooks with respect to all savings accounts, checking accounts and savings loan association share accounts, owned by you in whole or in part jointly as co-partner, or joint venture, in any business enterprise, or owned by an entity in which you have or have had a controlling interest at any time during the past 5 years.

9. The most recent bank ledger sheets in your possession, or accessible by you on the internet, with respect to all bank accounts in which you have a right to withdraw funds.

10. The most recent bank ledger sheets in your possession, or accessible by you on the internet, with respect to all bank accounts owned by you solely, or jointly as co-partner, or joint venture, in any business enterprise, or owned by any entity in which you have a controlling interest.



11. All checkbooks for all accounts on which you were authorized to withdraw funds for the past five (5) years.

12. All corporate securities (stocks or bonds) owned by you, directly or indirectly.

13. The latest available balance sheets and other financial statements with respect to any and all business enterprises of whatever nature in which you possess any ownership interest of 10% or more, whether as partner, joint venture, stockholder, or otherwise.

14. Your accounts receivable ledger or other company records which sets forth the names and addresses of all persons or business enterprises that are indebted to you and the amounts and terms of such indebtedness.

15. Copies of the partnership or corporate Income Tax Returns for any partnership or corporation in which you do possess or have possessed any ownership interest of 10% or more whether as partner, joint venture, stockholder or otherwise, for the last five (5) years.

16. The title certificates, registration certificates, bills of sale, and other evidences of ownership possessed by you or held for your beneficial interest with respect to any of the following described property owned by you or held directly or indirectly for your beneficial interest:

- a. Motor vehicles of any type;
- b. Commercial, business or construction equipment of any type; and
- c. Boats, launches, cruisers, planes, or other vessels of any type.

17. All records pertaining to the transfer of any money or property interests or financial interests made by you in the past 5 years.

18. Any and all memoranda and/or bills evidencing the amount and terms of all of your current debts and obligations.

19. All records indicating any and all income and benefits received by you from any and all sources for the past 5 years.

20. Copies of any and all brokerage account statements or securities owned by you individually, jointly with any person or entity or as trustee, guardian or custodian, for the past 5 years, including in such records date of purchase and amounts paid for such securities, and certificates of any such securities.

21. All records pertaining to the acquisition, transfer and sale of all securities by you or on your behalf for the past 5 years, such records to include any and all information relative to gains or losses realized from transactions involving such securities.

22. All policies of insurance in which you or any entity controlled by you is the owner or beneficiary.

23. Copies of any and all trust agreements in which you are the settlor or beneficiary together with such documents necessary and sufficient to identify the nature and current value of the trust res.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAGr  
Request to produce to Jeffrey Epstein (Punitive Damages)  
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I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve  
to all Counsel on the attached list, this 21<sup>st</sup> day of December, 2012.



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