

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

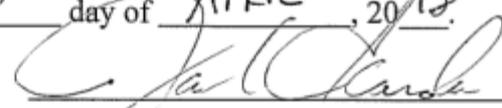
SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually, and  
[REDACTED] individually,

Defendant(s).

**MOTION FOR PROTECTIVE ORDER**

BRADLEY EDWARDS, by and through his undersigned attorneys, move this Honorable Court for the entry of an Order of Protection limiting the production required in response to the attached Amended Notice of Taking Deposition Duces Tecum on the grounds that production requested is overly broad, irrelevant, immaterial, not reasonably calculated to lead to the discovery of admissible evidence, and is unnecessarily intrusive into the financial privacy of BRADLEY EDWARDS.

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 25<sup>th</sup> day of APRIL, 2013.

  
\_\_\_\_\_  
Jack Scarola

Florida Bar No.: [REDACTED]

Primary E-mail: [REDACTED]

Secondary E-mail(s): [REDACTED]

Searcy Denney Scarola Barnhart & Shipley, [REDACTED]

[REDACTED]  
West Palm Beach, Florida 33409

Phone: [REDACTED]

Fax: [REDACTED]

Attorneys for BRADLEY J. EDWARDS