

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO. 50 2009CA040800XXXXMB AG

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

JEFFREY EPSTEIN,
Plaintiff,

-vs-

VOLUME I OF II

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

Defendants.

VIDEOTAPED DEPOSITION OF BRADLEY J. EDWARDS, ESQUIRE

Tuesday, March 23, 20010
10:00 - 5:07 p.m.

2139 Palm Beach Lakes, Boulevard
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1333

1 APPEARANCES:

2 On behalf of the Plaintiff:

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7 Phone: [REDACTED]

8 and

9 JACK ALAN GOLDBERGER, ESQUIRE
10 ATTERBURY, GOLDBERGER & WEISS, P.A.
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12 West Palm Beach, Florida 33401-5012
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14 and

15 On behalf of the Plaintiff:

16 ALAN M. DERSHOWITZ, ESQUIRE
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21 On behalf of the Defendant:

22 JACK SCAROLA, ESQUIRE
23 SEARCY, DENNEY, SCAROLA,
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27 Phone: [REDACTED]

28 ALSO PRESENT:

29 Jeffrey Epstein
30 Joseph Kozak, Videographer
31 Prose Reporting Services

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I N D E X

EXAMINATION	DIRECT	CROSS	REDIRECT
BRADLEY J. EDWARDS, ESQUIRE			
BY MR. CRITTON	5		

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P R O C E E D I N G S

- - -

Deposition taken before Cynthia Hopkins,
Registered Professional Reporter and Florida
Professional Reporter, and Notary Public in and for
the State of Florida at Large, in the above cause.

- - -

THE VIDEOGRAPHER: We are now on video
record. This is Media Number One in the
videotaped deposition of Bradley Edwards in the
matter of Jeffrey Epstein versus Scott
Rothstein, Bradley J. Edwards, and [REDACTED].

Today is Tuesday, March 23rd, 2010 at
10:00 a.m. We're here in the law offices
of Searcy, Denney, Scarola, Barnhart &
Shipley, [REDACTED]
West Palm Beach, Florida.

My name is Joe Kozak. I am the
videographer. The court reporter is Cindy
Hopkins from Prose, Prose Court Reporting
Agency.

Will counsel please introduce
yourselves, and then the court reporter
will swear in the witnesses.

MR. CRITTON: Bob Critton on behalf of the

1 Plaintiff, Jeffrey Epstein.

2 MR. GOLDBERG: Jack Goldberger on behalf
3 of the Plaintiff, Jeffrey Epstein.

4 MR. DERSHOWITZ: Alan Dershowitz on behalf
5 of the Plaintiff, Jeffrey Epstein, of counsel.

6 MR. SCAROLA: The record should reflect
7 that Mr. Epstein is also personally present.
8 My name is Jack Scarola. I am counsel on
9 behalf of the Defendant/Counter-Plaintiff, Brad
10 Edwards.

11 Thereupon,

12 (BRADLEY J. EDWARDS, ESQUIRE)

13 having been first duly sworn or affirmed, was
14 examined and testified as follows:

15 THE WITNESS: Yes.

16 DIRECT EXAMINATION

17 BY MR. CRITTON:

18 Q. Would you please tell us your full name
19 and home your home address.

20 A. Bradley James Edwards, [REDACTED]
21 [REDACTED].

22 Q. Date of birth, please.

23 A. [REDACTED].

24 Q. Mr. Edwards, have you ever had your
25 deposition taken before?

1 A. No.

2 Q. Okay. But you've counseled, you've
3 obviously taken a number of depositions both as a
4 Plaintiff and as a Defendant. You're familiar with
5 all the rules?

6 A. I know the rules.

7 Q. All right. Again if I ask you a question
8 you don't understand, if you would ask me or if you
9 want me to rephrase it, I will be happy to do that.

10 A. Yes.

11 MR. SCAROLA: Mr. Edwards, Mr. Edwards,
12 knows the rules. You can skip the
13 preliminaries.

14 MR. CRITTON: Is that a form objection?

15 MR. SCAROLA: No.

16 MR. CRITTON: Just a talk.

17 MR. SCAROLA: It's a, it's a request that
18 you not waste our time.

19 MR. CRITTON: I am not wasting your time.
20 And if we hadn't gone through that, we would
21 have been done with them, Jack.

22 BY MR. CRITTON:

23 Q. Mr. Edwards, are you currently employed?

24 A. Yes.

25 Q. And by whom are you currently employed?

1 A. I don't understand the question.

2 Q. For whom do you work at the current time?
3 Are you an employee?

4 A. I am a partner in the law firm of Farmer,
5 Jaffe, Weissing, Edwards, Fistos & Lehrman.

6 Q. Is that a professional association?

7 A. Yes.

8 Q. And you said you're a partner. Do you
9 have your own P.A. or is the only the Farmer -- what
10 was the second name, Jaffe?

11 A. Correct.

12 Q. And I will refer to it as Farmer, Jaffe,
13 if that's all right with you. Is Farmer, Jaffe
14 itself a P.A.; that is, are you a partnership of
15 P.A.'s?

16 A. Yes.

17 Q. Do you have your own professional
18 association?

19 A. Yes.

20 Q. Okay. What's it called?

21 A. Law Office of Brad Edwards, LLC.

22 Q. You are the sole member of that LLC?

23 A. Yes.

24 Q. And then your LLC is a partner of the
25 Farmer, Jaffe firm?

1 A. Correct.

2 Q. And do you hold yourself out to the public
3 as being a partner of that firm; that is you
4 individually?

5 A. What do you mean by hold myself out to the
6 public?

7 Q. If I got your letter would your letter
8 say, if I received a letter from you would it say
9 Brad Edwards, partner, or something to that effect?

10 A. I don't think so.

11 Q. Okay. What does your card say? Do you
12 have a business card?

13 A. I do.

14 Q. Okay. What does your business card--

15 A. Attorney.

16 Q. -- reflect? And when you introduce
17 yourself to clients or other attorneys for the first
18 occasion, do you introduce yourself as a partner of
19 that firm if asked?

20 A. If asked are you a partner; is that your
21 question?

22 Q. Correct.

23 A. Would I say yes? The answer is yes.

24 Q. When did you start -- I want to strike
25 that. Do you consider yourself an employee of the

1 partnership?

2 A. What do you mean by that?

3 Q. Do you understand what an employee is?

4 A. I work for the firm.

5 Q. You are certainly not --

6 A. I am employed there, so, yes.

7 Q. When did you start your association with
8 the Farmer, Jaffe firm?

9 A. Sometime during the month of November, 2009.

10 Q. And is that when the firm was incorporated
11 as a professional association?

12 A. I believe so.

13 Q. The attorneys who are in the current firm,
14 are they all former Rothstein Rosenfeldt Adler
15 attorneys; that is, the professional staff?

16 A. Yes.

17 Q. Is there anyone -- Let me strike that.

18 Do you have paralegals as well that
19 work there?

20 A. Yes.

21 Q. Are any of the paralegals former, and if I
22 refer to Rothstein Rosenfeldt Adler as RRA, or RRA,
23 is that all right with you?

24 A. I understand what you mean.

25 Q. Are there any other, are any of the

1 paralegals that are currently employed by Farmer,
2 Jaffe in any capacity whether they are independent
3 contractors -- well, let me strike that.

4 As employee's, I probably should ask
5 this question: Does the firm, Farmer, Jaffe have
6 employees --

7 A. Yes.

8 Q. -- separate and apart from the partners?

9 A. Yes.

10 Q. And they are actually employed by the
11 P.A., correct?

12 A. Correct.

13 Q. Does the firm have any paralegals that
14 came over from the RRA firm, RRA?

15 A. Yes.

16 Q. Who are they?

17 A. Maria and Beth.

18 Q. Does Maria have a last name?

19 A. Yes.

20 Q. What is it, please?

21 A. I believe it's pronounced Kelljian.

22 Q. Can you spell it?

23 A. I can give it my best shot, K-E-L-L-J-I-A-N.

24 Q. And Beth's last name is what, please?

25 A. Williamson.

1 Q. She's your current secretary/paralegal, or
2 do you have a secretary as well?

3 A. I don't understand your question.

4 Q. Do you have -- is Beth Williamson your
5 paralegal?

6 A. She's a paralegal at the law firm of Farmer,
7 Jaffe, Weissing, Edwards, Fistos & Lehrman.

8 Q. Does she primarily work for you?

9 A. No.

10 Q. Do you have a secretary as well?

11 A. The law firm? Yes.

12 Q. The secretary who works primarily for
13 you --

14 A. No.

15 Q. You just use whoever is available from a
16 secretary standpoint?

17 A. No.

18 Q. Who do you primarily use for secretary
19 services?

20 A. There is nobody who could fall into the
21 category of who I primarily use.

22 Q. Ms. Williamson, who, by whom, who, who was
23 the attorney at RRA with whom she primarily worked?

24 A. I believe it was several attorneys, and I
25 can't tell you who the attorneys were that she worked

1 for or with.

2 Q. Did she work with you at all at RRA?

3 A. In some limited capacity, maybe.

4 Q. Did she ever work on any of the -- you
5 have three cases that you ever filed -- or let me
6 strike that.

7 There are three cases that are in
8 existence at the current time. One is Jane Doe
9 versus Mr. Epstein which is, is a federal court case
10 and the Plaintiff's name is Jane Doe. That is one
11 of your cases, correct?

12 A. Correct.

13 Q. Or one of the firm's cases at the current
14 time?

15 A. Correct.

16 Q. There is another case versus [REDACTED]. Versus
17 Jeffrey Epstein and a third called [REDACTED]. versus
18 Jeffrey Epstein, correct?

19 A. Yes.

20 Q. And as a result all three of those cases
21 currently now are firm cases, the Farmer, Jaffe firm
22 cases?

23 A. Yes.

24 Q. Did Mrs. Williamson work on any of those
25 cases?

1 A. In what time period? What's your question?

2 Q. I'm sorry. During the time that you were
3 associated with RRA, did Mrs. Williamson work on
4 those cases?

5 A. Without you needing to ask 20 different
6 questions to get to your answer, I will tell you her
7 involvement was that after federal motions were drafted,
8 she was the person to literally file the motion. That
9 is her only involvement with the cases while at RRA

10 Q. She basically filed them through the Pacer
11 system?

12 A. Exactly.

13 Q. Prior to you working at Farmer, Jaffe by
14 whom were you employed? And by employed I mean in,
15 in a broad sense. You could have been an
16 independent contractor. You could have been a
17 partner. You could have been an employee.

18 A. The law firm of Rothstein Rosenfeldt Adler.

19 Q. When did you start working for RRA?

20 A. I believe April of 2009.

21 Q. Beginning of April?

22 A. Yes.

23 Q. I saw a pleading that was filed yesterday
24 and it was either [REDACTED], I am sorry, [REDACTED]. or [REDACTED].
25 that looked like there was a change of -- I'm sorry,

1 notice of appearance or something by RRA Would
2 that, in any way, if I asked you to assume that
3 that's correct, would that refresh your recollection
4 that it may have been at the end of March?

5 A. I don't understand that question at all.

6 Q. I saw a pleading that was filed or --

7 A. Yesterday you said.

8 Q. -- a paper that was filed. I was looking
9 at a pleading filed in either [REDACTED] or [REDACTED], and I
10 saw a paper that was basically a notice of
11 appearance on behalf of RRA And it looked like it
12 was dated around March 30 of 2009.

13 A. Okay.

14 Q. Is it possible that you started your
15 association with RRA at an earlier date than April
16 of '09?

17 A. Assuming that what you said is true, if that
18 document says that, then it's possible that is an
19 accurate reflection of when I began.

20 Q. Did you start working with RRA before you
21 filed any documents representing that RRA or that
22 you had now an affiliation with RRA?

23 A. No.

24 Q. Where the -- again, I don't remember,
25 whether there was a notice of additional counsel or

1 substitution of counsel. Did you, were the
2 substitution of counsel's filed the exact date that
3 you started with RRA?

4 A. I don't remember.

5 Q. When did your association with RRA
6 terminate or end?

7 A. The end of October 2009 or the beginning of
8 November 2009.

9 Q. And how did it terminate? How did your
10 relationship with RRA terminate?

11 A. The firm closed.

12 Q. Did you get, notification -- when you say
13 closed, meaning what?

14 A. Meaning what everybody in this entire room
15 knows is that the firm went from operating to no longer
16 operating.

17 Q. And how did you receive notice; that is,
18 did you receive some sort of notice that told you
19 that RRA now is a defunct firm? Did you receive
20 notification that was in bankruptcy? What, if
21 anything, did you receive?

22 A. I didn't receive anything.

23 Q. And then how did your relationship with
24 RRA end?

25 A. Came to work on a Monday morning, and there

1 was a meeting that was held informing all the employees
2 including myself that the firm no longer was financially
3 able to survive and therefore would be immediately
4 closing down.

5 Q. Who was the spokesperson at the meeting,
6 the main individual who advised those assembled in
7 the room that that's what was going to occur?

8 A. I don't remember.

9 Q. Was it -- did Rosenfeldt speak at all at
10 that meeting?

11 A. I, I can't remember.

12 Q. Do you remember the date of the meeting?

13 A. I remember that it was a Monday.

14 Q. Do you remember it being in October or
15 November?

16 A. Either the very end of October or the very
17 beginning of November.

18 Q. Did anyone -- well, let me strike that.
19 Do you remember whether the person -- let me strike
20 that.

21 At the meeting who was present, and I
22 don't mean individual names. Who did it, by groups,
23 who did it include?

24 A. The meeting was held in a cafeteria type room
25 in the building where RRA maintained its offices. And

1 the room was completely full to capacity with as many
2 employees of the Rothstein, Rosenfeldt Adler firm as
3 were in attendance at work that day.

4 Q. And included lawyers, paralegals, support
5 staff, investigators?

6 A. Literally --

7 Q. -- everyone, I mean everyone who obviously
8 showed up at the meeting?

9 A. I don't know.

10 Q. Did you see other lawyers there?

11 A. Yes.

12 Q. Did you see staff there?

13 A. Yes.

14 Q. Did you see paralegals there?

15 A. Yes.

16 Q. Did you see investigators there?

17 A. I can't necessarily remember whether or not I
18 saw investor -- investigators there.

19 Q. And did more than one person speak at the
20 meeting?

21 A. I don't remember.

22 Q. Okay. What else were you advised at the
23 meeting, if anything?

24 A. It was -- I stayed for very little of that
25 meeting. I don't know what was advised to others, but

1 what I heard was, firm is closing down. That's all I
2 needed to hear and I left.

3 Q. Did you subsequent -- well, let me strike
4 that. Did you, were you able to gain, gain access
5 to the building that day? I am sorry, access to
6 your, to the offices of the Rothstein firm that day?

7 A. Yes.

8 Q. And were you able to access any of your
9 files or your e-mail at that time?

10 A. What time?

11 Q. That same day, that Monday that you were
12 advised that the firm was shutting down.

13 A. Yes.

14 Q. And were you able to print documents?
15 Well, let me strike that. Were you able to take
16 documents relating to matters on which you worked
17 from the firm?

18 A. What do you mean by was I able to?

19 Q. Were you able to access and take with you
20 documents that related to files on which you were
21 working the preceding Friday when you were at RRA?

22 A. I believe so.

23 Q. Did you take, did you actually remove
24 documents, papers that were related to files that
25 you had on which you were working from RRA that day?

1 A. I don't believe so.

2 Q. Okay. Was anyone preventing you from
3 taking anything?

4 A. No.

5 Q. Okay. Did you print out any documentation
6 from your server or from the firm's server that day
7 to take with you?

8 A. Not that I recall.

9 Q. Do you recall taking anything from
10 RRA'office that day, that day being that same
11 Monday?

12 A. No.

13 Q. Obviously Scott Rothstein was not there?

14 A. Correct.

15 Q. Have you ever spoken, excuse me, have you
16 ever seen Mr. Rothstein since that Monday at the
17 meeting?

18 A. What do you mean have I seen him?

19 Q. Seen him in person, I'm sorry.

20 A. No.

21 Q. Okay, have you spoken with him at any time
22 since the Monday meeting at which time you were
23 advised that the firm was shutting down?

24 A. No.

25 Q. Have you spoken on any, with anyone on his

1 behalf; that is, who purports to represent
2 Mr. Rothstein since you left the firm that day?

3 A. No.

4 Q. Do you know Mr. Nurik?

5 A. Yes.

6 Q. Do you recog -- are you aware that he
7 represents Mr. Rothstein?

8 A. Yes.

9 Q. Okay. Have you spoken with him since that
10 Monday?

11 A. He called me on a morning before a hearing to
12 ask me where Judge Crow's courtroom was. And I told
13 him, and that was the extent of that conversation.
14 Otherwise, I have had zero communication with Marc
15 Nurik.

16 Q. With regard to the firm being advised that
17 the firm was shutting down on that Monday, did you
18 subsequently return to the firm's offices? Let me
19 strike that. How long did you stay at the firm that
20 day?

21 A. I don't remember.

22 Q. Did you stay all day?

23 A. I believe so.

24 Q. Were you able to work on your files?

25 A. I don't understand the question.

1 Q. Were you able to do legal work on the
2 matters that wherein you represent individuals?

3 A. Was I able to? Yes, I was physically able to
4 do that.

5 Q. Did you work on legal matters that day?

6 A. No.

7 Q. Did you subsequently, after that date, did
8 you return to the RRA offices?

9 A. Yes.

10 Q. And where are those offices or where were
11 those offices located?

12 A. [REDACTED]

13 Q. The address, please?

14 A. I don't remember.

15 Q. With regard to the --

16 A. [REDACTED]

17 Q. [REDACTED]

18 A. (Witness nods head.)

19 Q. Did you, did you after that Monday did you
20 return to the offices at [REDACTED] the RRA
21 offices?

22 A. Yes.

23 Q. And did you return every day thereafter
24 for a period of time?

25 A. No.

1 Q. Was there a point in time that you were
2 prevented from entering your office or the offices
3 of RRA?

4 A. Yes.

5 Q. At what point in time were you prevented
6 from going into the offices?

7 A. I don't remember.

8 Q. How many days were you able to access the
9 offices before you were prevented?

10 A. I don't remember.

11 Q. You don't know whether it was a day or
12 three days or five days that you were allowed to go
13 into the office?

14 A. The period of time that I was able to go into
15 the office encompasses all of those things that you just
16 said, one day, three days, five days, yes. I can
17 definitely say with certainty I was able to do that.

18 Q. During the month of October were you
19 allowed to go into the office more than ten days?

20 A. Yes.

21 Q. Did they put -- well, let me strike that.
22 Did someone put restrictions on what your access was
23 to the office, the RRA office?

24 A. Yes.

25 Q. Okay. Who put the restrictions on the

1 entry to the office?

2 A. I don't know.

3 Q. Well, who would, who would monitor whether
4 you came in or couldn't go into the office?

5 A. I don't know.

6 Q. Was there someone there?

7 A. Was there someone where?

8 Q. The impression I got is that there was
9 some limitation on your ability to access the RRA
10 offices after the Monday at which time you were
11 advised that the firm was shutting down. Did I
12 misunderstand you?

13 A. No, that's correct.

14 Q. Okay. Who then, if you know, or what, if
15 it was an entity, placed any restrictions on your
16 access to RRA offices?

17 A. I don't know.

18 Q. When you would go to the office -- well,
19 let me strike that. After how many days -- well,
20 let me strike that.

21 The very day, the same day that you
22 were advised that the office was closing down, were
23 there any individuals that were monitoring what, if
24 anything, was to be removed or not removed from the
25 office, like a security force, Broward County

1 Police, U.S. Marshals.

2 A. From my recollection there were at some point
3 in time, there were people in the office monitoring
4 activity in the office.

5 Q. Was that the first week after the Monday?

6 A. I don't recall.

7 Q. Did you ever, did you receive any
8 guidelines either at the Monday meeting or
9 thereafter as to what you could or could not remove
10 from the file, from the, I'm sorry from the RRA
11 offices?

12 A. I believe so.

13 Q. And who put those guidelines out, do you
14 recall?

15 A. No.

16 Q. Were they in a written form?

17 A. No.

18 Q. Okay. Was given in what form, how did you
19 learn what you could and could not take from the
20 office?

21 A. More rumor than anything else is what I
22 remember.

23 Q. Did you discuss that with other
24 individuals or other attorneys who were working at
25 RRA?

1 A. Possibly.

2 Q. Did you ever attempt to remove something
3 from the office of the RRA offices and someone
4 prevented you?

5 A. No.

6 Q. Did you ever -- and when I say remove I
7 mean in the sense of physically remove; that is,
8 take out boxes or take out files or something of
9 that nature.

10 A. I understand the definition of remove.

11 Q. With regard to, there were also, I
12 understand you had an e-mail server at the office?

13 A. Okay.

14 Q. Is that correct?

15 A. Yes.

16 Q. And I have seen something, there is
17 something that's called Qtask. Are you familiar
18 with Qtask?

19 A. Yes.

20 Q. And what do you understand Qtask or what
21 did you understand that Qtask did; that is, as an
22 electronic service?

23 A. A web based network to store files and other
24 materials.

25 Q. In terms of electronic storage, or

1 electronic data at the RRA firm, in addition to,
2 excuse me, the e-mail server was and Qtask, was
3 there anything else from an electronic storage or
4 communication means through RRA?

5 A. Yes.

6 Q. What else was there?

7 A. That stored electronic materials?

8 Q. Right, or that you could communicate with
9 someone else either inside or out of the firm. You
10 had the server, e-mail server. You had Qtask. What
11 else did you have?

12 A. To communicate with others, e-mail and Qtask.

13 Q. And how about within the confines of the
14 firm, was there another electronic mail system or
15 electronic system either for storage or for
16 communication?

17 A. To the best of my recollection, none for
18 communication. Storage, yes. There were electronic
19 paperless storage case management systems in place.

20 Q. And with regard to the electronic case
21 management system, were your files, including the
22 three cases involving Mr. Epstein, were those cases
23 on the electronic case management system?

24 A. Yes.

25 Q. And could you access the electronic case

1 management system; that is, did you utilize the
2 software that was available?

3 A. Yes.

4 Q. And had you ever used a system like that
5 before you came to the RRA firm, RRA?

6 A. I don't understand.

7 Q. Okay. Had you ever used an electronic
8 case management software system before you came to
9 RRA?

10 A. Yes.

11 Q. Was yours the system that you had used
12 before was that were you able to integrate that with
13 RRA, with the RRA file or system when you got there,
14 or did your files have to be put on the new RRA
15 system?

16 A. The latter.

17 Q. In addition, so we had the e-mail server,
18 Qtask, and electronic case management system. Was
19 there any other type of electronic storage or system
20 that was available for communication or storage at
21 RRA?

22 A. Not that I recall.

23 Q. With regard to the e-mail system, well,
24 with regard to the e-mail system, Qtask, and
25 electronic case management, did you require, was

1 there a password required to use or access each one?

2 A. No.

3 Q. Was there a password required to use any
4 of the three?

5 A. I don't believe so.

6 Q. As I saw in an order that with the Qtask
7 system that there was some sort of access code that
8 was required to get into Qtask.

9 A. I saw that too.

10 Q. Did you ever have, did you ever have such
11 a code or a password with regard to Qtask?

12 A. I don't remember.

13 Q. Has the receiver and/or it's, Mr. Seton or
14 his attorneys asked for you to provide any passwords
15 or information to access any of your files?

16 A. I don't think so.

17 Q. Do you understand that you have a
18 requirement or you're required to give the password
19 if requested by Mr. Seton?

20 A. I don't know the password to give to anybody.
21 I never knew there was a password.

22 Q. Did you --

23 A. I don't believe.

24 Q. Did you use Qtask?

25 A. I have used Qtask.

1 Q. With regard to your, the files
2 specifically, specifically the -- well, let me
3 strike that. During the time you were at RRA, of
4 the three files, Jane Doe, ■■■., and ■■■. or in
5 addition to those three files, did you represent any
6 other individuals who were potential claimants
7 against Mr. Epstein?

8 A. I don't believe so.

9 Q. All right. I received notification from
10 you as to a Ms. ■■■.?

11 A. ■■■.

12 Q. ■■■. and Ms. ■■■. I believe is her name?

13 A. Correct.

14 Q. Were either of those individuals, had
15 either of those individuals contacted you prior to
16 leaving the RRA firm?

17 A. I don't believe so.

18 Q. Is it your testimony then that none,
19 neither Ms. ■■■. nor Ms. ■■■. would have had a fee
20 agreement or representation agreement with the RRA
21 firm because they hadn't contacted you prior to your
22 departure from that firm; is that correct?

23 A. I'm not sure.

24 Q. Is it possible that Ms., either Ms. ■■■.
25 or Ms. ■■■. contacted you before you left the RRA

1 firm but you just didn't sign them up before you
2 left?

3 MR. SCAROLA: Objection, calls for
4 speculation.

5 THE WITNESS: Yes.

6 BY MR. CRITTON:

7 Q. Is there a reason that you would not have
8 signed them up during the time you were with -- or
9 let me strike that. Prior to the implosion, prior,
10 prior to that Monday when you were advised that the
11 RRA firm was closing down, had you made any plans to
12 leave that firm, that is the RRA firm?

13 A. No.

14 Q. Okay. Had you discussed with any other
15 attorneys in RRA departing from RRA or the RRA firm
16 prior to that Monday meeting at which time you were
17 advised that the firm was shutting down?

18 A. No.

19 Q. You indicated it's possible that Ms. [REDACTED].
20 or Ms. [REDACTED]. may have contacted you prior to your
21 departure or prior to that Monday meeting. What
22 makes you believe that?

23 A. I don't remember exactly the timing of any
24 communications between myself and Ms. [REDACTED]. or Ms. [REDACTED].
25 And it seems to me that it was around the time period

1 either just before or just after I do believe I spoke
2 with one or maybe both of them on at least one occasion
3 before the disbandment of RRA

4 And I know for a fact I signed each
5 one of the clients up after the disbandment of RRA
6 I can't tell you with any degree of certainty
7 whether they signed a fee agreement with RRA prior
8 to the disbandment.

9 Q. Have you been able to do any transfers of
10 your, of -- let me strike that. With regard to the
11 e-mail server at RRA, have you had occasion to
12 access that since that Monday; that is, the Monday
13 meeting that you referred to in either late October
14 or early November of '09?

15 A. Yes.

16 Q. All right. And have you had full access,
17 at some point did you get full access to all of your
18 e-mail that, that existed at least, that you had not
19 removed -- let me start again.

20 Under an e-mail server you, you have
21 the ability, obviously, to delete what you, what you
22 choose, correct?

23 A. As do you.

24 Q. As do I, right. And were you using like a
25 Microsoft Outlook program?

1 A. I don't remember.

2 Q. Okay.

3 A. I am now.

4 Q. Well, with the program that you did have,
5 could you delete it and then you would have to go
6 into the delete it and further delete it to clean it
7 out?

8 A. I don't remember.

9 Q. You don't remember back to October or
10 September of '09 at this point?

11 A. That's just not what I do. I mean, I don't
12 just delete e-mails. So I don't know what you had to
13 do. You take me for somebody more e-mail savvy than I
14 am about that.

15 Q. Do you basically save all your e-mails or
16 had you in the past when you were at RRA?

17 A. I don't intentionally save or delete. They
18 are just there.

19 Q. And when you, when you, at some point
20 after the Monday meeting, were you able to transfer
21 whatever e-mails you had from RRA to your current
22 program?

23 A. At Farmer, Jaffe, Weissing?

24 Q. Correct.

25 A. No.

1 Q. Were you at some point given access to all
2 your e-mails so it could be downloaded either on a
3 disk, hard disc, floppy disk, or some other storage
4 medium so that you had access to all your prior
5 e-mails when you were at RRA?

6 A. I don't know.

7 Q. Did you ever make that request to someone,
8 either the receiver or anyone else associated with
9 RRA?

10 A. I don't remember if I made that request.

11 Q. I thought you indicated earlier,
12 Mr. Edwards, that you had access to some of your
13 e-mails.

14 A. I had access to all of my e-mails on that
15 Monday of the meeting, on the next day, on that Tuesday,
16 right, the immediately following the meeting. 32:46 at
17 some point in time it was cutoff and since that time,
18 when it was cutoff, I don't believe I have ever had
19 access back to my entire e-mail system.

20 Q. Okay. Have you had access to portions of
21 your e-mail system?

22 A. Not that I remember.

23 Q. Have you attempted to obtain access or
24 requested that you obtain access or information from
25 your e-mail, from the RRA e-mail server?

1 A. I don't remember.

2 Q. You say you don't remember. Would there
3 have been a reason that you either requested or
4 didn't request access to your prior e-mail? When I
5 say prior I mean at RRA

6 A. Usually you read all of your e-mails and there
7 shouldn't be anything that I had not read. However,
8 there are some e-mails that you would like to keep
9 around. So there may have been reason for me to have
10 requested. However, I don't believe I was ever granted
11 access to those e-mails, and I can't specifically
12 remember requesting the e-mails.

13 Q. Within, within the e-mails you would have
14 corresponded with or communicated with people
15 outside of the firm and as well as people within the
16 firm, true?

17 A. Ever, yes.

18 Q. During the time you were RRA

19 A. Did I ever communicate with somebody outside?
20 I communicated with you.

21 Q. Correct.

22 A. So you know that to be true. Yeah, of course.

23 Q. I know that to be true. And my question
24 is as well within the server or e-mail system with
25 RRA, did you ever also communicate with other

1 paralegals, other staff at RRA?

2 A. Yes.

3 Q. And would you see, receive, if it was
4 something from one of the other partners at RRA
5 would you receive; that is, did you get firm-wide
6 e-mails from time to time about specific topics?

7 A. Yes.

8 Q. All right. When you, during the time that
9 you went back to RRA, did you printout, and up until
10 the time you were denied access to the e-mail
11 server, did you ever print, printout any e-mails or
12 transfer any e-mails that you can recall?

13 A. Not that I can recall.

14 Q. All right. With regard to the Qtask
15 system, have you been, since that Monday have you
16 been able to use that system in any fashion?

17 A. What do you mean by that?

18 Q. Have you been able to access Qtask either
19 to look to see what was there or in the alternative
20 pull information from so that you could printout
21 information from Qtask?

22 A. I don't know. Probably.

23 Q. Okay. Have you attempted since that
24 Monday -- well, after that Monday meeting -- let me
25 strike that.

1 Since the meeting that occurred on
2 that Monday at which time you were advised the firm
3 was shutting down, have you accessed Qtask for any
4 reason?

5 A. I don't believe so.

6 Q. What kind of -- you said, you described
7 earlier that Qtask was a web based network of files
8 for files and other materials. And in what fashion
9 did you use Qtask during the time you were with RRA,
10 RRA?

11 A. Qtask is a project centric web-based program.
12 So projects could be created. The project would
13 normally be a case, and that case discussed with lawyers
14 the way that you may gather around a table and discuss
15 it. And at times I was invited to projects on various
16 cases and utilized that system.

17 Q. Is that the only fashion that you would
18 have used Qtask during the time you were with RRA?

19 A. Yes.

20 Q. And when you say a project, as an example,
21 Jane Doe versus Jeffrey Epstein, if that had been
22 put, just this is hypothetically and then I will ask
23 you later whether that was in the system but if you
24 wanted or let me strike that.

25 Could Jane Doe versus Jeffrey Epstein

1 been put in the Qtask program for, for purposes of
2 creating a project?

3 A. Repeat it again.

4 Q. Okay. Could a case like Jane Doe versus
5 Jeffrey Epstein been put in the Qtask system as a
6 project so that you and others could look at it?

7 A. You mean is, is, is the project capable of
8 holding such a project?

9 Q. Yes, just generically.

10 A. Yes, yes.

11 Q. And in terms of the RRA system, did the
12 RRA system ever have as, as a project Jane Doe
13 versus Jeffrey Epstein?

14 A. I don't believe so.

15 Q. Did you ever look in the Qtask, Qtask
16 system to determine whether you or anyone on your
17 behalf or any other person in the firm had ever put
18 Jane Doe versus Jeffrey Epstein into the Qtask
19 system?

20 A. Yes.

21 Q. Okay. And what did you find or not find?

22 A. I, I don't remember if that was the name of
23 any project in the system. It could have been, but it
24 may not have been. I don't remember that as a specific
25 project in the system.

1 Q. When you say a specific project, if I
2 understand you correctly, Mr. Edwards, that would
3 have been, as an example, it could be any case. It
4 could be a real estate case, it could be a labor
5 case, it could be Jane Doe versus Jeffrey Epstein,
6 but someone could, someone whether it was you or
7 someone else could put in facts and information
8 about the case?

9 A. Similar to any case management system that's,
10 it just happens to be web based, but you have the right
11 concept.

12 Q. Is the concept the same concept for an
13 electronic, for the third electronic system, you had
14 the electronic case management system?

15 A. I suppose at full capacity it, it may. I just
16 wasn't that adept at Qtask to know all of the
17 capabilities of Qtask.

18 Q. With regard to the third item which I am
19 going to come back to Qtask in just a minute, the
20 electronic case management software, what was the
21 name of that software?

22 A. I believe it's called Fortis.

23 Q. F-o-r-t-i-s?

24 A. I think so.

25 Q. I may have asked you, have you ever used a

1 Fortis system before you came to Rothstein --

2 A. Had I ever used Fortis before I came to RRA?

3 Q. Yes.

4 A. No.

5 Q. Now, back to Qtask. Did you, do you have
6 a recollection -- let me strike that. Did you ever
7 personally ever put any information into the Qtask
8 system for a project --

9 A. Yes.

10 Q. -- on your cases?

11 A. Yes.

12 Q. Did you ever put, and I think you just
13 testified as to the best of your recollection, Jane
14 Doe versus Jeffrey Epstein was never put into the
15 Qtask system, correct?

16 A. As the name of a project?

17 Q. Yes, sir.

18 A. No. I don't believe so.

19 Q. Well, was, when you say the name of a
20 project, could, could information about Jane Doe
21 versus Jeffrey Epstein have gotten into the system
22 but not identified as a, quote, unquote, project?

23 MR. SCAROLA: Calls for speculation.

24 MR. CRITTON: Do you understand the
25 question, sir?

1 THE WITNESS: I don't understand.

2 MR. SCAROLA: Are you asking whether that,
3 that capability existed?

4 MR. CRITTON: Sure.

5 THE WITNESS: Did the capability exist?

6 MR. CRITTON: Right. Again Mr. Scarola
7 didn't want to let me go through the
8 explanation because he thought you understand
9 it and I know you did, Brad. I know you
10 understand.

11 THE WITNESS: I don't know that I
12 understand that question. I want to make sure
13 that I answer your question accurately.

14 MR. CRITTON: See, cut me off too early,
15 earlier.

16 MR. SCAROLA: No, too late.

17 BY MR. CRITTON:

18 Q. Mr. Edwards, what I am trying to get is
19 you described the Qtask as being project centric.
20 And as I understood it, the project may be given a
21 label or a title?

22 A. Correct.

23 Q. So, it could be Jane Doe versus Epstein;
24 it could be Jane Doe; it could just be assault case;
25 is that correct, whatever you wanted to call or

1 someone wanted to call the project?

2 A. You have the right idea.

3 Q. And if I understand it correctly is in
4 terms of the project, is if it was, if it was as an
5 example the Jane Doe case, you could, you or anyone
6 else could put information in about Jane Doe, might
7 not call it Jane Doe, but whatever amount of
8 information you or anyone else wanted to put in,
9 could put it into the Qtask so that other attorneys,
10 staff, investigators, paralegals, anyone who could
11 access the Qtask system, could see that project; is
12 that correct?

13 A. So that the people that were invited to the
14 project could see the project and those people only.

15 Q. And when you say invited to the project,
16 is, would, would, assuming you're the person who
17 created the project --

18 A. Okay.

19 Q. -- would you then set the parameters as
20 to, or the guidelines as to who could come into the
21 project?

22 A. Maybe.

23 Q. Okay. If, again, if it wasn't you, who
24 else could have set the parameters; that is, who
25 else can access the file?

1 A. Let's say I am the lead on a project: I
2 believe that is what it was called the, I believe that
3 was the title given to the person that initiates the
4 project, if I want to then invite one or two or three or
5 100 other attorneys to that project to help work on
6 various aspects, I could do that.

7 And if I didn't choose to add
8 somebody, and another attorney said make me a lead
9 so that I can add somebody, that's another way that
10 that other lead could have invited somebody else to
11 the project.

12 And when you open up the interphase
13 of Qtask, you're immediately shown a portfolio of or
14 a photograph of the people that are invited to the
15 specific project and those people can access it.

16 Q. So, if it was, as an example, if it was,
17 if you were the lead person and you invited
18 Mr. Adler and you invited Mr. Berger in and
19 Mr. Rothstein in, there, when you punched up the
20 Qtask on the screen, I would see Mr. Rothstein's
21 picture. I would see yours. I would see
22 Mr. Berger's and Mr. Adler's?

23 A. Correct.

24 Q. As an example.

25 A. Yes.

1 Q. Would I only see pictures or would I see
2 names as well?

3 A. I don't remember that.

4 Q. Would it be a correct statement that
5 during the time you were at RRA, you did use Qtask?

6 A. Yes.

7 Q. And did you ever put projects; that is,
8 did you ever as the lead create projects through the
9 Qtask system?

10 A. Yes.

11 Q. Would someone else, would, assuming that
12 you were the lead and you created the project, would
13 only you be able to add information to Qtask?

14 A. No.

15 Q. Okay. Was, was any invitee or person
16 allowed access, was he or she allowed to add to
17 Qtask?

18 A. Correct.

19 Q. Okay. Would he or she also be able to
20 delete from Qtask if they were an invitee?

21 A. I don't know that.

22 Q. Were you ever, did you ever -- in any -- I
23 assume that you were not only the lead but from time
24 to time you were invited into Qtask; is that
25 correct?

1 A. That's correct.

2 Q. And during the time that you did, you,
3 when you were the lead, are you the one who chose
4 what went into the file, to the Qtask file?

5 A. No.

6 Q. Who would have made that decision?

7 A. Everybody in the, anybody that's invited can
8 add. I'm not the one that does it. Nobody has to come
9 to me to insert anything in the Qtask. You can add if
10 you're invited.

11 Q. Well, let's assume that you are, you're
12 the lead but you don't invite anyone; that is, you
13 create the 45:01 time project. You're the person
14 doing the adding, not staffwise but you're the
15 person that puts the information in.

16 A. I understood the question until you added the
17 segment about maybe some staff member helps you add the
18 Qtask. That just doesn't make sense with the program.

19 Q. Well, with Qtask, if you're the lead and
20 you don't invite anyone in because you're creating
21 the project itself, are you the person who chooses
22 exactly what goes in?

23 A. I am the person who puts in what goes in.

24 Q. All right. Are you, are you responding to
25 questions within Qtask where you put, you describe

1 the case. You describe the facts. You describe the
2 witnesses, things of that nature, or are you
3 actually, can you -- well, first of all can you do
4 that?

5 A. Can you describe the case and describe the
6 facts? Yes, you can.

7 Q. And is that, when you say project centric,
8 is that what you're doing very much like the
9 electronic, much like the Fortis program?

10 A. It's not very much like the Fortis program in
11 my mind, but it's, it is what you are doing, you're
12 inputting information about a specific project.

13 Q. Can you put in the facts about a case,
14 again just generically, can you put in facts about a
15 particular case and then ask someone in your
16 invitees to comment on what they think, might think
17 the value of the case is or is not and give
18 suggestions as to discovery and things of that
19 nature? Is that all true?

20 A. Yes.

21 Q. And with regard to -- and once those
22 invitees show up and they're photographed, then each
23 of those individuals can have access to the file and
24 add their thoughts or opinions --

25 A. Repeat it.

1 Q. -- or suggestions. Let me strike that.

2 With regard to the Qtask, once,
3 once -- assuming that you're the lead, you create
4 the project and then you, you say, okay, now it's in
5 a form that I want to get some invitees involved.
6 Do you then send that project; that is, you then on
7 Qtask you list the invitees and those people would
8 be, get some sort of cue that they had been invited
9 to the project up to the Qtask system?

10 A. I don't remember the exact process for
11 inviting, but there is a way to invite. And to the best
12 of my recollection, they do receive a notification that
13 they have been invited so that they can accept.

14 Q. Okay. Can, can someone who has not been
15 invited also access the system?

16 A. No.

17 Q. Okay. And how do you know that?

18 A. That's just not how the system works.

19 Q. Well, it may not be how the system works,
20 but say if Mr. Rothstein wanted to access when he
21 was the head person at the RRA firm, he wanted to
22 access the Q, Qtask system, do you believe that he
23 would have been able to access the system whether
24 you invited him or not?

25 A. No.

1 Q. And why do you believe that to be true?

2 A. It's not how the system works.

3 Q. Well, at least as you understand the
4 system?

5 A. Well, if you want to tell me that it works a
6 different way, then maybe you can persuade me but that's
7 how I understand the system.

8 Q. I am not, I'm not arguing with you.

9 MR. SCAROLA: Actually you are.

10 THE WITNESS: Assuming you had been on
11 Qtask, it would help to get past all of these
12 questions. If you had been on Qtask it would
13 help to get past all of this and you would see
14 exactly what I am trying to describe to you.

15 MR. CRITTON: I would like to get on
16 Qtask.

17 THE WITNESS: Qtask.com.

18 BY MR. CRITTON:

19 Q. Okay. I'll remember that. With regard
20 to, so as to whether or not Mr. Rothstein could have
21 accessed it or Mr. Rosenfeldt or anyone else who was
22 not an invitee at least from your knowledge, you
23 believe they cannot access it?

24 A. Correct.

25 Q. Can you as well on Qtask, can you as well

1 post documents like an attachment?

2 A. I believe it has that capability. I think the
3 answer is yes.

4 Q. Now, with regard to the three cases that
5 you -- well, with regard to Jane Doe versus Jeffrey
6 Epstein, I think you already told me you don't
7 recall whether you put that in Qtask; is that
8 correct?

9 A. I didn't tell you that.

10 Q. Okay. Let me ask you then: Did you ever
11 use Qtask, you personally create a project as it
12 related to Jane Doe's case against Mr. Epstein?

13 A. No.

14 Q. To your knowledge did you direct anyone --
15 well, let me strike that. Did you direct anyone to
16 create a project on Qtask for the Jane Doe case
17 against Mr. Epstein?

18 A. No.

19 Q. Okay. Do you know have you ever have
20 looked at the Qtask system -- let me strike that.

21 From what you were able to access of
22 the Qtask system, did you ever go online on the
23 Qtask system to determine whether anyone else had
24 ever put the Jane Doe case against Mr. Epstein on
25 Qtask?

1 A. No.

2 Q. And therefore as you sit here today, you
3 don't know whether someone else, whether it was
4 another attorney, whether it was an investigator or
5 a staff person ever put the Jane Doe versus Epstein
6 case on Qtask?

7 A. Or whether it was you, right.

8 Q. Right. As to [REDACTED], did you ever put
9 [REDACTED]'s case or direct -- well, let me strike that.
10 Did you ever create a project for [REDACTED] on Qtask?

11 A. No.

12 Q. Did you ever direct that someone else
13 create a project in Qtask for the [REDACTED] case, [REDACTED]
14 versus Jeffrey Epstein case?

15 A. No.

16 Q. Do you have any knowledge as to whether --
17 let me strike that. Did you ever go on Qtask or
18 have you been able to determine whether anyone else
19 within the RRA firm put the [REDACTED] versus Jeffrey
20 Epstein case or any aspects of it on Qtask? Have
21 you looked or do you know?

22 A. I don't know.

23 Q. Has anyone told you that the [REDACTED] case
24 against Jeffrey Epstein was on Qtask?

25 A. No.

1 Q. Okay. And so it's your testimony as far
2 as you know the [REDACTED] versus Jeffrey Epstein case was
3 not ever on the Qtask system; is that correct?

4 A. To the best of my recollection today.

5 Q. When I describe both the Jane Doe versus
6 Jeffrey Epstein case and the [REDACTED] versus Jeffrey
7 Epstein case being on Qtask, I don't necessarily
8 mean just the pleadings. I mean any aspect of it,
9 not necessarily the pleadings or the fact that the
10 case was there but the factual circumstances
11 surrounding either case.

12 A. I am not going to get into what my
13 work-product privilege, I am not going to allow you to
14 pierce that privilege. I am not going to tell you what,
15 regarding those cases, was or was not on Qtask.

16 Q. Well, let me ask a specific question. So
17 if you want to claim some sort of privilege so the
18 record is clear.

19 A. Sure.

20 Q. With regard to, and let me go first to
21 the, finally to the [REDACTED] case. With regard to the
22 [REDACTED] versus Jeffrey Epstein case or any aspect of
23 it, did you ever put [REDACTED] into the Qtask system?

24 MR. SCAROLA: Let us save you some time.

25 Why don't you ask whether the answers with

1 regard to [REDACTED]. would be any different than the
2 answers given with respect to the other two
3 cases.

4 MR. CRITTON: I would have rather have it
5 specific. Oftentimes judge want to see that.
6 So I understand that if I want something broad
7 later on, I would be glad to accept that, but
8 thank you. Do you remember my question, sir.

9 THE WITNESS: No.

10 BY MR. CRITTON:

11 Q. Okay. With regard --

12 MR. SCAROLA: For the record let me
13 observe I believe that your insistence upon
14 asking the individual questions that you have
15 now asked twice with regard to the other
16 claims, and your refusal to ask the blanket
17 question in the way in which I have suggested
18 is an annoyance and embarrassment and a
19 harassment of this witness which does nothing
20 but unnecessarily consume his time.

21 BY MR. CRITTON:

22 Q. Mr. Edwards, with regard to [REDACTED]., did you
23 ever put any aspects of that case; that is, not just
24 the pleadings but any aspects of the [REDACTED]. versus
25 Jeffrey Epstein case onto Qtask? Did you ever

1 create a project?

2 MR. SCAROLA: You may answer.

3 THE WITNESS: There was never a project
4 entitled to my recollection [REDACTED], versus Jeffrey
5 Epstein, [REDACTED], versus Jeffrey Epstein, Jane Doe
6 versus Jeffrey Epstein. And you're asking was
7 any information about those cases ever put onto
8 Qtask?

9 MR. CRITTON: I didn't ask that question.

10 THE WITNESS: Okay.

11 MR. CRITTON: But I will in just a minute.

12 THE WITNESS: And my answer is no, those
13 titles are not, I don't believe were ever on
14 Qtask.

15 BY MR. CRITTON:

16 Q. Now, separate and apart from -- let me
17 strike that. Let me just stay with [REDACTED], with regard
18 to [REDACTED]. Did anyone else at your direction put any
19 information regarding [REDACTED], into the Qtask system, an
20 attorney, staff person, or secretary or another
21 lawyer?

22 A. What do you mean by information?

23 Q. Any information about [REDACTED], into the Qtask
24 system?

25 A. I don't remember.

1 Q. Okay. So we don't -- you gave a broader
2 response to a question or that is you rephrased the
3 question. So, let me ask it in a broader sense.

4 Was any information about the, your
5 three clients put into the Qtask, about your three
6 clients, Jane Doe, [REDACTED], and [REDACTED]. versus Jeffrey
7 Epstein, or against Jeffrey Epstein, was any
8 information ever put into the Qtask system? I don't
9 want to know the information, just whether you put
10 information into the Qtask system.

11 A. Yes.

12 Q. Did you do it yourself or did you do it in
13 conjunction with someone else?

14 A. Explain to me what you mean by did I do it in
15 conjunction with somebody else.

16 Q. Well, is, you may have typed in the
17 information yourself.

18 A. I strike one key; somebody else strikes
19 another?

20 Q. No, you may have input all the information
21 you want, whatever information you want to put into
22 Qtask, you may have made the decision to do that.
23 All right. My question is someone else, a
24 secretary, or a paralegal may have helped you, an
25 investigator may have put some information in, at

1 least at your direction regarding these three
2 individuals' claims against Mr. Epstein?

3 A. Information that I put into Qtask is
4 information that was inputted into Qtask by me.

5 Q. Did you ever direct anyone else to put any
6 additional information in with regard to those three
7 claims against Mr. Epstein?

8 A. I don't believe so.

9 Q. And what type of information did you put
10 into Qtask regarding the claims against Mr. Epstein?

11 MR. SCAROLA: Read that back, please.

12 (The requested portion of the record was
13 read by the reporter.)

14 MR. SCAROLA: We're going to object and
15 that I will instruct you not to answer on the
16 basis of both attorney-client and work-product
17 privileges.

18 MR. CRITTON: I assume if Mr. Scarola
19 asserts an objection, you're adopting that and
20 you would assert it. So, we don't have to do
21 that as A repetitious project here?

22 MR. SCAROLA: Correct.

23 MR. CRITTON: And that's correct.

24 MR. SCAROLA: You can, you can assume that
25 my instructions to Mr. Edwards will be followed

1 by Mr. Edwards unless we expressly tell you
2 otherwise.

3 MR. CRITTON: All right.

4 MR. SCAROLA: So, when I instruct him not
5 to answer, he will follow that instruction.

6 MR. CRITTON: And you will do that,
7 correct?

8 THE WITNESS: That's correct.

9 BY MR. CRITTON:

10 Q. With regard to the, the generic, and if I
11 understood you correctly that there was generic or
12 there was information put in on one, two, or three
13 of your clients' claims against Mr. Epstein, did you
14 have or identify individuals who were invitees to
15 that Qtask file?

16 A. I'm sorry, what's your question?

17 Q. Did you designate individuals who could be
18 invitees to that file?

19 A. Did I invite anybody into the project?

20 Q. Sure.

21 A. Yes.

22 Q. Okay. Who did you invite into the Qtask?

23 And let me ask you this first, Mr. Edwards: With
24 regard to the claims against Mr. Epstein, the only
25 three -- well, and I probably need to step back.

1 Would it, would it be a correct
2 statement during the time that you with RRA that the
3 only claims that you had against Mr. Epstein were
4 Jane Doe, ■■■, and ■■■.?

5 A. The only clients I represented, yes.

6 Q. And not necessarily in a lawsuit but those
7 are the only people that, that you and RRA
8 represented in any, in any existing or potential
9 claims against Mr. Epstein during the time you were
10 with RRA?

11 A. I believe so.

12 Q. By the way, could, could an outside
13 person, that is a person outside the firm access
14 Qtask as well?

15 A. You can access it right now.

16 Q. Can -- did you ever allow someone who was
17 not associated with RRA to access the Qtask file
18 relating to Mr. Epstein?

19 A. No.

20 Q. Okay. Was there more than one file that
21 was created associated with the claims against
22 Mr. Epstein?

23 A. I don't remember.

24 Q. Did anyone to your knowledge -- well, let
25 me strike that. Did anyone other than you create a

1 Qtask file relating to claims again Mr. Epstein?

2 A. To the best of my knowledge, no. I take that
3 back. I don't know who created the project, but I am
4 only aware of the project that I participated in related
5 to Mr. Epstein and his molestation of many children,
6 period.

7 Q. And what did you call the project; that is
8 how it was identified on the Qtask system?

9 A. I don't remember.

10 Q. Do you recall when it was created?

11 A. No.

12 Q. Do you recall whether it was created
13 within a month of your coming to RRA?

14 A. I don't remember.

15 Q. Do you recall whether it was, I think you
16 said approximately the beginning of April of '09 you
17 came to RRA, correct?

18 A. Correct.

19 Q. All right. And is it, just so the record
20 is clear it's, your testimony is you don't recall
21 whether you created the project in April, May, June,
22 July, August, September or October relating to the
23 claims against Mr. Epstein?

24 A. I don't remember if I created the project,
25 period.

1 Q. Separate and apart from whether -- well,
2 let me strike that. If you didn't create the
3 project, who would have?

4 A. I don't know.

5 Q. Well, do you remember -- let me strike
6 that. Do you know whether with regard to the
7 project, and for purposes of at least this question,
8 let me just call it the Epstein project, are you
9 okay with that designation?

10 A. Yes.

11 Q. Okay. With regard to the Epstein project
12 that was created in the Qtask system, if I am
13 understanding correctly, you don't remember whether
14 you created it or someone else did, correct?

15 A. Correct.

16 Q. Who would have had access to your files
17 that could have created the Epstein project other
18 than you?

19 A. That question makes no sense.

20 Q. Okay.

21 MR. SCAROLA: And it also assumes facts
22 not in evidence and does not have a prior
23 proper predicate.

24 THE WITNESS: That's why it doesn't make
25 sense.

1 BY MR. CRITTON:

2 Q. During the time that you were at RRA, did
3 a number of people have access to the Epstein files
4 either, either in a paper form or in an electronic
5 form?

6 A. Either/or, yes.

7 Q. And maybe I should get a definition of,
8 with regard to the Epstein files, you had three
9 cases, Jane Doe, [REDACTED], and [REDACTED], correct?

10 MR. SCAROLA: Excuse me. You used Epstein
11 file as a defined term earlier. Are you now
12 using it generically?

13 MR. CRITTON: I am going to use it
14 generically and when I come back to Qtask, I am
15 off Qtask for just a minute. So that I have an
16 understanding of how your filing was kept. And
17 I will come back to Qtask. So, right now I am
18 using the Epstein files in a generic form. Not
19 using Qtask. Okay.

20 MR. SCAROLA: Okay.

21 BY MR. CRITTON:

22 Q. With regard to the Epstein files or
23 matters, I know you had -- we know you have three
24 cases that were filed that we have already
25 identified, Jane Doe?

1 A. That's good.

2 Q. [REDACTED]. and [REDACTED]., correct?

3 A. Correct.

4 Q. Were all materials relating to Jeffrey
5 Epstein kept, kept under, at least for filing, for
6 filing purposes at RRA, were they kept under the
7 Epstein designation or, or some other designation?

8 A. Yes.

9 Q. Okay. And what was the designation?

10 A. I don't remember but it was either under
11 Epstein or some other designation.

12 Q. And at RRA, were there both paper files or
13 paper information as well as electronic information
14 that was stored or kept regarding the Epstein files?

15 A. Correct.

16 Q. Was RRA supposed to be or at least
17 designed to be a paperless office?

18 A. Yes.

19 Q. And would every document that came that
20 was associated with the Epstein files, again in the
21 generic sense, was that scanned in or put into the
22 system in some fashion at RRA?

23 A. To the best of my knowledge.

24 MR. CRITTON: Just two minutes.

25

1 BY MR. CRITTON:

2 Q. With regard to the scanned system; that
3 is, to store the electronic records, was that put in
4 through the, through the Fortis program?

5 A. Yes, I believe so.

6 Q. And did you as well -- let me strike that.
7 Prior to coming to RRA had you ever worked in a
8 paperless file or in a paperless office?

9 A. I don't understand.

10 Q. Had you ever been working in an office
11 prior to coming to RRA that was designed to be
12 paperless?

13 A. No, but as I mentioned earlier, I have worked
14 with case management software that stores electronic
15 versions of files, so therefore there is a paperless
16 system.

17 Q. Did you as well when you came to RRA with
18 regard to the Epstein related matters or the content
19 of your Epstein investigation and files, had you
20 placed any of that on a prior, a previous paperless
21 system or did you have the paper itself or both?

22 A. Both.

23 Q. And during the time that you operated at
24 RRA, did you operate both with a, you individually
25 with regard to the Epstein files, did you operate

1 both in a paper and a paperless manner?

2 A. No.

3 Q. Did you operate only in a -- well, in what
4 way did you operate?

5 A. Paperless.

6 Q. Okay. So if, if as an example I sent you
7 correspondence or answers to interrogatories or a
8 response to a pleading and it came in the mail,
9 would that document be scanned and then you would
10 toss away the paper?

11 A. I don't know.

12 Q. So, you may well have had paper in
13 addition to -- well, let me strike that. Do you
14 even know whether the document was scanned?

15 A. If you're telling me you sent correspondence
16 in the mail and I would later see that correspondence in
17 my virtual mailbox, I make the logical assumption that
18 it was scanned. I never observed anything being
19 scanned.

20 Q. Okay. And do you, if something came to
21 you by mail, whether it was some form of discovery
22 or request, and I will be in the state cases, where,
23 which is not a paperless system and you don't file
24 through Pacer, would you ever see the paper that
25 actually came to your office or would you only see

1 it electronically?

2 A. For the most part I would see it
3 electronically, but I can't say that I have never seen a
4 piece of paper come in.

5 MR. CRITTON: Okay. Let me take a few
6 minute break.

7 MR. SCAROLA: Well, wait a second. Do you
8 want to break at this point?

9 THE WITNESS: Not really.

10 MR. SCAROLA: Okay. We would like to keep
11 going.

12 MR. CRITTON: Can I just go to the rest
13 room for two minutes?

14 MR. SCAROLA: Yes.

15 THE VIDEOGRAPHER: We're now off video
16 record. The time is 11:21 a.m.

17 (A brief recess was held.)

18 THE VIDEOGRAPHER: We're now on video
19 record. The time is 11:28 a.m.

20 BY MR. CRITTON:

21 Q. Couple, few more questions in Qtask. Did
22 you ever allow Mr. Rothstein, was he an invitee on
23 the Epstein-related projects?

24 A. I don't believe so.

25 Q. With regard to the third electronic, the

1 Fortis system where you, if I understand you
2 correctly, you input various information into that
3 Epstein regarding Epstein files; is that correct?

4 A. No.

5 Q. You never used those systems with regard
6 to Epstein files?

7 A. I used the systems. I never input anything
8 into the system. I think it gets scanned in.

9 Q. And could anyone in the firm access the
10 Fortis system?

11 A. I don't know.

12 Q. Could you access other files that weren't
13 necessarily yours within the Fortis system if you
14 wanted to?

15 A. I don't know.

16 Q. Mr. Edwards, with regard to your
17 employment with RRA, did you know any of the RRA
18 partners prior to coming to that firm in
19 approximately April of '09?

20 A. What do you mean by know them?

21 Q. Did you know them?

22 A. Yes.

23 Q. As either an acquaintance or a friend?

24 A. Yes.

25 Q. Did you have any friends at the RRA firm

1 before joining them?

2 A. People that I would consider to be my friend,
3 yes.

4 Q. Who.

5 A. Russell Adler.

6 Q. And how did you know Mr. Adler?

7 A. We worked out at the same gym for about,
8 approximately four or five years.

9 Q. What were you doing, prior to your
10 association with RRA, what was your employment?

11 A. What?

12 Q. Were you working as a solo practitioner?
13 Were you working with another firm prior to coming
14 to RRA in April of 09?

15 A. Solo practitioner.

16 Q. How long had you been a solo practitioner?

17 A. Approximately two years.

18 Q. During the time you were a solo
19 practitioner, did you ever have any associates
20 working for you, solo imply that you're the only
21 one, is that true, or did you have associates that
22 actually worked for you?

23 A. Various times I had clerks, law school clerks,
24 but that was it.

25 Q. But no other lawyers?

1 A. Right.

2 Q. Did you ever have an investigator work for
3 you?

4 A. Yes.

5 Q. Okay. Do you know an individual by the
6 name of Fisten, F-i-s-t-e-n?

7 A. I know an individual whose last name is
8 Fisten.

9 Q. All right. What's his first name, the one
10 you know?

11 A. Mike.

12 Q. Michael Fisten?

13 A. Yes.

14 Q. Mike Fisten ever do any work for you when
15 you worked as a solo practitioner at any time prior
16 to you joining RRA?

17 A. No.

18 Q. Did you know of Michael Fisten or Mike
19 Fisten prior to joining RRA?

20 A. No.

21 Q. With regard to the investigators that you
22 used prior to joining RRA, did you use, or were any
23 of those individuals ever employed by RRA during the
24 time you were there?

25 A. No.

1 Q. How did it, how did it happen that you
2 came to be employed by RRA?

3 A. I was offered a job.

4 Q. And how did that come, how did that come
5 about?

6 A. Talking with Russell Adler.

7 Q. Had you ever had a case against Mr. Adler
8 or with Mr. Adler, either you were on the same side
9 or against?

10 A. Yes.

11 Q. On how many occasions?

12 A. I can't recall.

13 Q. Okay. Did Mr. Adler approach you or did
14 you approach him?

15 A. We worked out at the same gym. It wasn't
16 about approaching somebody.

17 Q. How did the topic come up?

18 A. He works at this law firm Rothstein Rosenfeldt
19 Adler, and would talk about it in a positive way for
20 years before I joined the firm.

21 Q. And how did it come up that you would be
22 interested in possibly working there; that is did he
23 say gee, Brad, you should come talk to me or did you
24 say I am interested in working for the firm?

25 A. He would ask if I would be interested in

1 joining the firm.

2 Q. Okay. And what happened then? What
3 ultimately happened that you, that you went from
4 just having an interest to actually contemplating or
5 being offered a position?

6 A. I didn't say I had an interest.

7 Q. So, what happened? How did you then end
8 up at RRA?

9 A. Numerous conversations with Russell Adler and
10 him telling me about some of the other people there that
11 I believed to be good lawyers, respected, ethical
12 lawyers, and that this is a good place to work, great
13 comradery, you have a team, I know you handle big cases;
14 this will be something that will be good for you. And
15 that was something I talked to him about seriously for
16 four months maybe before joining RRA before finally
17 agreeing to meet Scott Rothstein.

18 Q. All right. Had, did Mr. Adler ever
19 discuss with you parameters or potential income or
20 salary or whatever the compensation package would
21 be --

22 A. Not specifically.

23 Q. -- before you first met with
24 Mr. Rothstein?

25 A. Not specifically.

1 Q. How many times did you meet with Scott
2 Rothstein prior to accepting a position with RRA?

3 A. Once.

4 Q. Where did the meeting take place?

5 A. The restaurant BOVA.

6 Q. Did you understand Mr. Rothstein had an
7 interest in BOVA?

8 A. At the time?

9 Q. Yes, sir.

10 A. No.

11 Q. Did you learn that during the time that
12 you worked for RRA

13 A. Yes.

14 Q. Okay. Who was present other than
15 Mr. Rothstein when you met with him at BOVA?

16 A. Nobody.

17 Q. Who had set up the meeting?

18 A. Russell.

19 Q. And had anything been discussed at least
20 as of that time with regard to what your opportunity
21 was or in terms of compensation?

22 A. Specifically, no.

23 Q. How long did the meeting with
24 Mr. Rothstein last?

25 A. Ten minutes.

1 Q. Did you have lunch with him or you just
2 sat down and talked with him at the table at the
3 restaurant?

4 A. Sat down and talked to him.

5 Q. Had you submitted any kind of a resume to
6 Mr. Adler as to what your experience was?

7 A. No.

8 Q. So, you, at that time you are a solo
9 practitioner. Mr. Adler calls you and says, or you
10 express an interest. Mr. Adler says we have an
11 interest in talking to you, and you set up a meeting
12 with Mr. Rothstein. Is that pretty much it?

13 A. You're now making things up that is totally
14 inaccurate, and doesn't reflect what I have been telling
15 you at all. I didn't express any interests. I wasn't
16 looking for a job. I wasn't seeking him out. In fact,
17 that is the exact opposite of what I have just gone
18 through explaining to you about conversations at the gym
19 that ultimately lead to him convincing me this is a good
20 place to come into and me agreeing to this meeting with
21 Scott Rothstein.

22 Q. Okay. When you went to meet with Mr!
23 Rothstein did you have any interest or was this just
24 a throw-away meeting. Maybe I misunderstood. What
25 did you -- let me strike that. What was the purpose

1 of the meeting if you had no interest in considering
2 an opportunity with RRA?

3 A. For the most part placate Russell Adler.

4 Q. Did Mr. Adler know the type of cases you
5 had?

6 A. Of course.

7 Q. And was he aware as of that date you had
8 filed the three cases against Mr. Epstein?

9 A. I don't believe so.

10 Q. Had you -- is it your belief that the
11 three cases against -- well, let me strike that. Do
12 you recall when the first meeting was or the only
13 meeting that you had with Mr. Rothstein prior to
14 joining the firm?

15 A. It was prior to joining the firm.

16 Q. All right. When was that?

17 A. I don't remember.

18 Q. Was it within a month of your joining RRA,
19 two months, three months, six months?

20 A. Definitely within six months of joining the
21 firm. Definitely within three months of joining the
22 firm. Within that three month period, I don't recall.

23 Q. So, sometime between January and April of
24 '09, you would have met with Mr. Rothstein for ten
25 minutes?

1 A. I believe so.

2 Q. Okay. What did you talk about; that is,
3 what was the substance of the meeting?

4 A. Russell says you would be an asset to the
5 firm. I will treat you fairly. How, how much do you
6 expect to make? Okay. I can't do that, but as soon as
7 you show your worth here, your salary is exponentially
8 increased because at this firm we operate under a system
9 of fairness. That was the gist of the meeting.

10 Q. Did he ask you how much you were making at
11 that time or how much you had made the preceding
12 year, '08?

13 A. I believe so.

14 Q. What did you tell him?

15 MR. SCAROLA: Objection. Instruct you not
16 to answer on the basis of economic privacy.

17 BY MR. CRITTON:

18 Q. Did you tell him what you had made, total
19 compensation for the year 2008?

20 A. I don't remember.

21 Q. Well, if I, if I understood you correctly,
22 I thought he said is I can't meet that salary or
23 that level of compensation, so you must have told
24 him something.

25 A. Yeah. I answered his question, what did you

1 expect.

2 Q. What did you tell him that you expected?

3 MR. SCAROLA: Objection, economic privacy.

4 BY MR. CRITTON:

5 Q. All I am interested now, not necessarily
6 what you were earning but what you told him, i.e.,
7 Mr. Rothstein that you wanted to get or expected to
8 earn if you considered a job at RRA

9 MR. SCAROLA: Objection. Economic
10 privacy, instruct you not to answer. It's
11 neither relevant nor material nor reasonably
12 likely to lead to relevant material information
13 and invades the economic privacy of the
14 witness.

15 MR. CRITTON: Is that form?

16 BY MR. CRITTON:

17 Q. Mr. Edwards, you gave him a number, is
18 that correct? Him meaning Mr. Rothstein.

19 A. I believe so.

20 Q. And was the number that you gave him more
21 than you had earned for the year 2008 or less?

22 MR. SCAROLA: Same objection.

23 MR. CRITTON: Or the same?

24 MR. SCAROLA: Same objection, same
25 instruction.

1 BY MR. CRITTON:

2 Q. Did you tell him that you -- did you tell
3 him that you wanted to make more money than you had
4 in the proceeding year?

5 MR. SCAROLA: Same objections and
6 instructions.

7 BY MR. CRITTON:

8 Q. Did he tell you how much you would be paid
9 if you came to work at RRA; that is, did he mention
10 a number: This is what your salary would be if you
11 come and work here?

12 A. I believe so.

13 Q. And what number did he say to you?

14 MR. SCAROLA: Objection and same
15 instruction.

16 BY MR. CRITTON:

17 Q. Did he also tell you that you would get an
18 economic incentive; that is, at the, at sometime
19 during the course of the year based upon your
20 production?

21 A. I would be compensated fairly.

22 Q. And that was it?

23 A. That was the gist.

24 Q. Okay. Did he talk about any benefits that
25 you would receive?

1 A. Possibly.

2 Q. Do you recall what he said?

3 A. What do you mean by benefits?

4 Q. I mean would you get health insurance and
5 those types of things as well?

6 A. I believe that was discussed. I'm not sure.
7 I can't tell you I got them but I don't know.

8 Q. Did you discuss any of your cases that you
9 had with him?

10 A. No.

11 Q. Okay. Did you sign an employment
12 agreement at any time with RRA?

13 A. No.

14 Q. After the -- let me go back. Did you say
15 you did or did not discuss any of your current cases
16 with him?

17 A. Did not.

18 Q. Okay. Were you aware, had you discussed
19 your cases -- I think you said you had discussed
20 your cases or Russell Adler had an idea of the type
21 of cases you had?

22 A. Over the years Russ and I are friends; we
23 talked about cases.

24 Q. Did you say you had discussed the Epstein
25 cases with him? Him, meaning Adler.

1 A. I, I don't believe I discussed the Epstein
2 cases with Russell Adler until after I was employed at
3 RRA

4 Q. Did you mention Mr. Epstein at your
5 meeting with Mr. Rothstein?

6 A. No.

7 Q. Did you mention any of your three clients
8 who were suing Mr. Epstein at the meeting with
9 Mr. Rothstein?

10 A. No.

11 Q. With regard to the, did you, did you
12 discuss with him if you came to work with RRA that
13 the cases -- well, let me strike that. Did he
14 mention that if, if you came and worked for the firm
15 that those cases would become the property of RRA?

16 A. No.

17 Q. Did you understand that to be true?

18 A. I mean, I suppose so.

19 Q. Okay. Did --

20 A. I understood that I was going to be an
21 employee of the firm, of course.

22 Q. Well, did, did you, at the conclusion of
23 the meeting did you say, yes, I would like to work
24 here or how did you leave it?

25 A. Think about it.

1 Q. And how long did you think about it?

2 A. I don't remember.

3 Q. Did you, and who did you contact? Well,
4 let me strike that. At some point did you make a
5 decision --

6 A. Yes.

7 Q. -- to go work for RRA, correct?

8 A. Correct.

9 Q. Did Mr. Rothstein at the initial meeting
10 tell you whether you would be a partner?

11 A. No.

12 Q. Did he describe that you would be at least
13 to the public at large you would be described as a
14 partner?

15 A. No.

16 Q. Did you understand who the partners
17 were -- well, let me trick that. Is RRA, was RRA a
18 PA?

19 A. I don't know.

20 Q. Did you ever find out during, up through
21 today's date do you know whether RRA was a PA or an
22 LLC or an LLP?

23 A. No.

24 Q. Did you ever go online to look at who the
25 officers and directors were or had members if it was

1 an LLP?

2 A. During the initial, initial meeting with Scott
3 Rothstein, he told me there are only two equity partners
4 of this law firm, and it will always be that way; myself
5 and Stuart Rosenfeldt, period.

6 Q. And did he say that they each own
7 50 percent, or did he say, they were just partners?

8 A. Did not say.

9 Q. Prior to your -- let me strike that. I
10 think as you said at some point you made a decision
11 to join RRA?

12 A. Right.

13 Q. And who did you convey that to?

14 A. Russell.

15 Q. And what happened thereafter? That is,
16 how did you go from then being a solo practitioner
17 into RRA? How did you integrate yourself? What was
18 the timing and what did you do?

19 A. At some point in time I was no longer working
20 in my Hollywood office and was working at RRA on Las
21 Olas. So, physically I showed up to work at a different
22 location.

23 Q. And did someone -- well, let me strike
24 that. From the time that you announced that you
25 would go, you told Mr. Adler up until the time you

1 ended up at RRA, how much time passed?

2 A. I don't know.

3 Q. Prior to starting at RRA, did you have any
4 further conversations with Mr. Rothstein; that is,
5 up until the day that you showed up at that office?

6 A. No.

7 Q. And in terms of the cases; that is, the
8 cases with [REDACTED], with [REDACTED], Jane Doe and [REDACTED]. those
9 are cases that you had signed up when you were a
10 sole practitioner; is that correct?

11 A. Correct.

12 Q. And with each of those cases there was a,
13 there is also another lawyer that was involved --
14 well, let me strike that. In one or more of those
15 cases is Mr. Howell involved, or was he at the time
16 you were a solo practitioner?

17 A. What do you mean by involved?

18 Q. Involved, was he a referring lawyer?

19 A. Yes.

20 Q. Was he the referring lawyer on all three
21 of those cases?

22 A. He was at least the referring lawyer directly
23 on one.

24 Q. Which one? I'm sorry. I didn't mean to
25 interrupt you.

1 A. I'm finished.

2 Q. Which case was he the referring lawyer,
3 Mr. Howell?

4 A. [REDACTED].

5 Q. And he may be the referring lawyer on Jane
6 Doe, and [REDACTED], you just don't know as you sit here,
7 or he is?

8 A. He referred [REDACTED]'s case.

9 Q. And the other two cases is he is shown as
10 the referring lawyer?

11 A. Yes.

12 Q. There is also a person named Cassell who I
13 think is an attorney from Utah?

14 A. Okay.

15 Q. Do you recognize the name?

16 A. Yes.

17 Q. Okay. And what's his first name?

18 A. Paul.

19 Q. All right. Is he in any way a referring
20 lawyer, considered a referring lawyer with regard to
21 any of the three cases against Mr. Epstein?

22 A. No.

23 Q. What's his role?

24 A. Handles certain appellate issues.

25 Q. Okay. Is he, is he involved in as part

1 of, as a potential recipient of any contingency fee
2 or is he paid on an hourly basis, either when you
3 were a sole practitioner during the RRA stages or at
4 the current time?

5 A. Contingency.

6 Q. Does he get part, at least as it was set
7 up as a sole practitioner was Mr. Cassell also on
8 the contract with each of the three individuals?

9 A. I don't believe so.

10 Q. You don't -- he is not on any of the
11 contracts, Mr. Cassell?

12 A. There is a contract that he is on but your
13 question is when the cases were first signed up, was he
14 on the initial contract. And I believe the answer to
15 that is no.

16 Q. Prior to the time or during the time that
17 you were in sole practice before you went to RRA was
18 Mr. Cassell ever on any of the contracts with the
19 three Plaintiffs?

20 A. Yes.

21 Q. Okay. When you moved to RRA, was a new
22 fee agreement signed with each of the individuals,
23 each of the three Plaintiffs?

24 A. No.

25 Q. Was there some form of an assignment?

1 A. Well, not to my knowledge. I don't want to
2 say no, but I don't know of any fee agreement that was
3 signed with the client.

4 Q. As a -- from the time that the original --
5 let me strike that. If I understood you correctly
6 is as an example [REDACTED]. was your first case?

7 A. First client.

8 Q. First client, right. Mr. Howell would
9 have referred the case, so he would have shown up as
10 a referring order. And at some point Mr. Cassell
11 also came on the contractor or a contract; is that
12 correct?

13 A. A contract, yes.

14 Q. So, there was at least two contracts with
15 regard to [REDACTED].?

16 A. That I remember.

17 Q. And with regard to [REDACTED], Jane Doe, and
18 [REDACTED], you don't recall any new contract being signed
19 between those individuals and RRA; is that correct?

20 A. That is correct.

21 Q. And with regard to the, whatever the
22 contingency fee was in each of those three
23 contracts, was that to be split? When you went to
24 RRA, how was it to be determined what RRA would
25 receive versus what you would receive or Mr. Cassell

1 or Mr. Howell, assuming there had been some
2 resolution?

3 A. RRA would be standing in my shoes.

4 Q. And if I understand it correctly, there
5 was never an assignment of your contracts; that is,
6 as a solo practitioner to RRA; is that correct?

7 A. Correct.

8 Q. Okay. And it was your intent just
9 whatever the contract said when you went from solo
10 practitioner to RRA, if those cases had resolved
11 during that time period, RRA, you would have paid
12 RRA that portion to which you were been entitled and
13 Howell and a Cassell would have gotten their
14 percentage?

15 A. Correct.

16 Q. And with regard to, with the new firm, the
17 Farmer, Jaffe firm, where those new fee agreements
18 have been signed with your three clients?

19 A. Yes.

20 Q. And are Mr. Cassell and Mr. Howell still
21 on those contracts?

22 A. Yes.

23 Q. Has the receiver made a claim against the
24 proceeds of these three cases; that is, he filed,
25 Mr. Seton on behalf of or as trustee, has he filed a

1 lien again those cases?

2 A. No.

3 Q. Has he sent you any correspondence
4 indicating that he intends to assert a lien against,
5 for attorney fees and/or costs that were incurred
6 during the time those cases were at RRA?

7 A. Not specifically related to those cases, but
8 in general, that concept is something that has been
9 communicated by a receiver or a trustee to us at Farmer,
10 Jaffe, Weissing.

11 Q. Have you at any time; that is, have you
12 acknowledged, has anyone at Farmer, Jaffe
13 acknowledged their responsibility to repay monies to
14 RRA?

15 A. I don't understand the question.

16 Q. If the case is settled, does Farmer, Jaffe
17 intend to repay the receiver a portion of the fees
18 at costs?

19 A. That issue has not been resolved.

20 Q. With regard to, with regard to the
21 third-party --

22 (Interruption at the door.)

23 BY MR. CRITTON:

24 Q. Other than the attorneys is there -- with
25 regard to the, other than the attorneys, is there

1 anyone else other than, on any of these three cases;
2 that is, potentially RRA, potentially your new firm,
3 Mr. Cassell, Mr. Howell and the Plaintiff, does
4 anyone else stand to benefit from a recovery in any
5 of those cases?

6 A. No.

7 Q. Has anyone, has any interest in any of the
8 three cases been assigned to a, to a third party
9 other than a law firm or a lawyer or a law firm;
10 that is, to an outside service?

11 A. No.

12 Q. Okay. Have any of the potential
13 settlements -- I'm sorry. Have any of the potential
14 proceeds from any settlement or verdict been
15 assigned or sold to anyone to your knowledge?

16 A. No.

17 Q. Has [REDACTED], Jane Doe, or [REDACTED] sold,
18 assigned, exchanged for consideration, money, or
19 promises of money, any portion of their potential
20 settlements?

21 A. No.

22 Q. Or recoveries?

23 A. No.

24 Q. If I understood you correctly,
25 Mr. Edwards --

1 MR. SCAROLA: Let me interrupt for just a
2 moment. I don't know whether the circumstance
3 applies but I want to be sure, does the scope
4 of your question include a letter of protection
5 to a health care provider?

6 MR. CRITTON: No.

7 MR. SCAROLA: I don't know whether that
8 has occurred in any of these cases, but I
9 assume that's not what you're looking for?

10 MR. CRITTON: I wasn't, but no, I'm
11 looking for -- I think it would not be applied
12 to any of the three.

13 You understand I wasn't talking about
14 health care providers. I am talking about
15 some independent person or entity that may
16 have purchased some interest or have been
17 assigned some interest in any of those
18 three lawsuits. Do you understand that?

19 THE WITNESS: I think I understood your
20 question, and my answer was responsive and I
21 was not thinking about letters of protection at
22 the time that I gave my answer.

23 BY MR. CRITTON:

24 Q. With -- if I understood you correctly,

25 [REDACTED]. was your first case?

1 A. You understood me correctly.

2 Q. All right. And when did [REDACTED] retain your
3 services, please?

4 A. And by first case, just to clarify, she was my
5 first client --

6 Q. I will rephrase it.

7 A. -- related to the matter that we're all
8 familiar with that relates to things that happened to
9 [REDACTED] when she was young.

10 Q. Let me rephrase the question this way: If
11 I understand your testimony is [REDACTED], and I'm
12 interested in Epstein cases; I am not interested in
13 other portions of your practice. You understand
14 that?

15 A. I do. And I think that you understand that
16 this case, [REDACTED]'s case and [REDACTED] case did not begin as a
17 case against Jeffrey Epstein. You know that and I know
18 that, and that's why it's difficult for me to ask,
19 answer these questions related to these clients because
20 this began as a case against the United States
21 Attorney's Office.

22 Q. All right. With regard to the, at least
23 your first representation of any of your three
24 clients that relate to Mr. Epstein in some fashion,
25 your first client was [REDACTED]; is that correct?

1 A. That is correct.

2 Q. Do you recall when you first -- well, let
3 me strike that. She was referred to you by
4 Mr. Howell?

5 A. That is correct.

6 Q. Okay. And how did Mr. Howell know you?

7 A. I have known him for a long time.

8 Q. Law school?

9 A. No. I have known him since, I'm from
10 Jacksonville Beach. He's from Jacksonville. I have
11 known him when I was probably ten years old.

12 Q. Okay. Has Mr. Howell, prior to [REDACTED], had
13 he ever referred to you any other client?

14 A. Yes.

15 Q. Did it involve some sort of a sexual
16 assault or battery?

17 A. Yes.

18 Q. How many clients prior to [REDACTED]. had
19 Mr. Howell ever referred you?

20 A. I don't know.

21 Q. More than one?

22 A. Yes.

23 Q. When [REDACTED]. was referred to you, what was
24 your understanding as to the nature of the
25 representation, what would it be?

1 A. I don't understand.

2 Q. Why did [REDACTED] come, why did she hire you in
3 the first place? What was the purpose?

4 A. This is going to get into attorney-client
5 privileged information as to why she hired me which
6 would incorporate the things that she told me that
7 related to my representation, therefore, I am invoking
8 the privilege and not answering.

9 Q. With regard to [REDACTED], you filed a case --
10 well, let me ask you this: Do you know how [REDACTED] came
11 to contact Mr. Howell? Did he ever relate that to
12 you?

13 MR. SCAROLA: If it's in information that
14 you obtained from your client, I instruct you
15 not to answer. If it's information that you
16 obtained from Mr. Howell, I also instruct you
17 not to answer. Both instructions are on the
18 basis of attorney-client and work-product
19 privileges.

20 THE WITNESS: Attorney-client and
21 work-product privilege.

22 BY MR. CRITTON:

23 Q. Did you, did Mr. Howell -- and I don't
24 want to know the information, at least right now --
25 did Mr. Howell give you any information about [REDACTED].

1 prior to her coming to see you or your seeing her?

2 A. Yes.

3 Q. Okay. And did [REDACTED] for the first, on the
4 first occasion come to your office or did you talk
5 to her by phone or did you go to her place?

6 A. First time I talked to [REDACTED]?

7 Q. Yes, sir.

8 A. Was over the telephone.

9 Q. All right. And how long, how much time
10 transpired before [REDACTED] retained your services; that
11 is, how many conversations did you have with her
12 before she ultimately retained your services?

13 A. One conversation over the telephone and then
14 the next meeting was in person at my office. That
15 meeting culminated with her retaining my services.

16 Q. And the initial conversation you had with
17 her, what did she relate to you?

18 A. That's attorney-client privilege information
19 that I am not going to divulge.

20 Q. During the time that you have been
21 involved in this case on behalf of [REDACTED], has
22 Mr. Howell participated in the case; that is, has he
23 done work on the case?

24 A. Yes.

25 Q. What kind of -- what has he done?

1 MR. SCAROLA: Objection, attorney-client
2 privilege and work-product. Instruct you not
3 to answer.

4 BY MR. CRITTON:

5 Q. Your second, your next client was whom
6 relating to Mr. Epstein or to the United States
7 Government?

8 A. I don't remember.

9 Q. You ultimately filed a case styled Jane
10 Doe 1 and 2 were petitioners versus the United
11 States of America in July of '08, correct?

12 A. That's correct.

13 Q. Okay. Who was Jane Doe 1?

14 A. [REDACTED].

15 Q. Who was Jane Doe 2?

16 A. [REDACTED].

17 Q. At the time that suit was filed, were you
18 representing Jane Doe-[REDACTED], I'm sorry, Jane Doe?

19 A. I believe so, but I'm not sure.

20 Q. In terms of the work that you did for,
21 that you have done for all three of the individuals
22 when you were a solo practitioner, did you keep
23 track of the time; that is, did you keep time
24 records?

25 A. What's your question?

1 Q. During the time that you were a solo
2 practitioner working on [REDACTED] Jane Doe, whichever of
3 the three cases that you had, did you keep time
4 records?

5 A. Some.

6 Q. Do you keep time records on contingency
7 cases generally, or did you during that time period?

8 A. It's my intent to.

9 Q. Okay. Same would be true with, when you
10 were at RRA, did they have a time program?

11 A. They did have a time program.

12 Q. Did you input your time that you spent on
13 the Epstein related cases?

14 A. That was a requirement of the firm.

15 Q. Okay. So, you would have been put down
16 whatever time you spent, whether it was a
17 contingency fee case or an hourly case; is that
18 correct?

19 A. For the most part; that's correct.

20 Q. During the time that Mr. Howell has been
21 associated with the case, does he provide you with
22 time records as to the work or the amount of work
23 that he has done on the case?

24 A. No.

25 Q. Okay. Does he keep track of his time that

1 he has spent on each of the cases?

2 A. I do not know.

3 Q. Did you -- has he prepared any pleadings
4 or documents associated with the cases?

5 MR. SCAROLA: You can answer that
6 question.

7 THE WITNESS: Define prepared.

8 BY MR. SCAROLA:

9 Q. All right. Prepared, prepared, start,
10 first of all, started from scratch; that is, has he
11 prepared any of the pleadings or papers that have
12 been filed in any of the three cases starting from
13 scratch that he would have been -- not because you
14 said this but he started with the complaint and you
15 may have changed it, but he started the preparation
16 of the document?

17 A. Your question is has he started the
18 preparation of a document now, right?

19 Q. Any document, any paper that's been filed
20 in the cases or I would say passed back and forth
21 between lawyers in any of the three cases?

22 A. Has he had edited revised, I mean what --

23 Q. Right now I am just asking did he start
24 the document such as a complaint or a similar type
25 document?

1 A. That was filed in the case?

2 Q. Correct.

3 A. No.

4 Q. Okay. Has he worked on documents, whether
5 it's editing, adding, deleting from pleadings that
6 you, pleadings or papers that you have prepared?

7 A. Yes. Bob, can you hand me that water?

8 Q. Yes.

9 A. Thanks. Appreciate it.

10 Q. You're welcome. Has he continued, did he
11 continued to be involved not only when you were a
12 solo practitioner but during the time that you were
13 with RRA with regard to editing or working on the
14 cases?

15 A. To an extent.

16 Q. Okay. Do you, how often on the cases have
17 you consulted with Mr. Howell? By that I mean
18 before a decision is made as to how you want to do
19 discovery or proceed with the filing of the pleading
20 or how you're going to respond, does Mr. Howell, do
21 you consult with Mr. Howell during the time you were
22 both solo practitioner and were at RRA?

23 A. Is your question asking for the answer to be
24 in a percentage? How often do I consult? I am just not
25 sure how to quantify.

1 Q. Sure. I am okay with that. How often do
2 you consult with Mr. Howell with regard to those
3 three cases prior to the time that you started with
4 your current Farmer, Jaffe association?

5 A. It is an impossible question for me to answer
6 accurately with a percentage that I have spoken with
7 Mr. Howell about any particular document or anything.

8 Q. As to pleadings, do you discuss, do you
9 send it to him for his review, editing, before you
10 file a pleading?

11 A. Typically no.

12 Q. How often do you consult or have you
13 consulted with Mr. Howell during the time you were
14 with RRA?

15 A. What type of an answer do you want in terms of
16 how often have I?

17 Q. Do you do it once a day?

18 A. Have I ever? I have.

19 Q. Is it a pretty common practice that when
20 you're going to file or do something that you would
21 contact Mr. Howell?

22 A. Not at all.

23 Q. So, do you --

24 A. Not at all common I mean.

25 Q. So, during the course of the month, say

1 during the time that you were at RRA, how often
2 would you consult with Mr. Howell regarding the
3 cases? And I recognize every day or every week
4 might be different. Would you speak with him like
5 once a month, or two or three times a month, or
6 generally once every couple of months?

7 A. Depending on what was going on in the cases at
8 the time, at sometimes more than others.

9 Q. How did [REDACTED] come to be a client of yours?

10 A. She called me.

11 Q. And how did she get your name?

12 MR. SCAROLA: To the extent that your
13 response to that question would require that
14 you reveal either work-product or
15 attorney-client privileged information, I
16 instruct you not to answer.

17 THE WITNESS: I simply don't know.

18 BY MR. CRITTON:

19 Q. Did Ms. [REDACTED] hire you in the or -- I'm
20 going to strike that.

21 How many conversations did you have
22 with and/or meetings did you have with Ms. [REDACTED].
23 before you hired her, or before she hired you. I'm
24 sorry.

25 A. I don't remember.

1 Q. Did she ever come and meet you at your
2 office?

3 A. From the beginning of time until today?

4 Q. No. Back at the time prior to retaining
5 your services.

6 A. I don't remember.

7 Q. Did you ever meet her at her residence or
8 place of work? Let me ask you this: Have you ever
9 met her at her place of business or a place of
10 business?

11 A. No.

12 Q. Have you ever met her at her home, whether
13 it's an apartment or home, whatever?

14 A. Now, you're asking from the beginning of time
15 until now?

16 Q. No. Up until the time she hired you, did
17 you ever meet with her?

18 A. Okay.

19 Q. At her home or apartment.

20 A. To the best of my recollection, no.

21 Q. Did you -- did she sign, to the best of
22 your recollection did she sign a fee agreement?
23 Well, let me strike that. There is a, there is a
24 written fee agreement between [REDACTED]. and you and
25 then --

1 A. Correct.

2 Q. -- her originally?

3 A. Correct.

4 Q. Did you ever meet her prior to her signing
5 that fee agreement?

6 A. Yes.

7 Q. And do you remember where that meeting
8 took place?

9 A. Generally, yes.

10 Q. Okay. Where?

11 A. A park.

12 Q. And what town?

13 A. I don't know.

14 Q. You don't know whether it was in Broward
15 County or Palm Beach County?

16 A. I do know.

17 Q. Which county?

18 A. Palm Beach County.

19 Q. Was that arranged by her to meet her
20 there?

21 A. Yes.

22 Q. And what, for what purpose did Ms. [REDACTED].
23 originally hire you?

24 MR. SCAROLA: I am going to object. That
25 calls for attorney-client privilege

1 information.

2 BY MR. CRITTON:

3 Q. When you met Ms. [REDACTED] at the park was
4 anyone else present?

5 A. Yes.

6 Q. Who?

7 A. I don't know.

8 Q. Male or female?

9 A. I presume both. It's a park.

10 Q. No, no, no. In the meeting that you had
11 with her -- my guess is there were probably a lot of
12 people in the park?

13 A. Correct.

14 Q. In the meeting that you had with [REDACTED].
15 was anyone else present?

16 A. For the conversations between myself and
17 Ms. [REDACTED], no.

18 Q. When you first met with [REDACTED] was anyone
19 present for the conversations between that you and
20 Ms. [REDACTED].?

21 A. No.

22 Q. I think you told me at the time that the
23 complaint was filed or at the time that the Jane Doe
24 1 and 2 sued the United States Government which was
25 in early July, it was July 8th of '08, you don't



1 recall whether you were representing Jane Doe at
2 that time?

3 A. I believe I was but I do not recall for sure.

4 Q. At the time do you know whether, at the
5 time that you represented Jane Doe 1, do you know
6 whether her name, whether she was considered a
7 victim by the United States Attorney's Office?

8 A. Ask your question again.

9 Q. All right. At the time you began
10 representing [REDACTED], or at any time prior to the filing
11 of the lawsuit against the United States Government
12 in July of '08, did you learn whether she was listed
13 as a, or deemed to be a victim by the United States
14 Attorney's Office?

15 MR. SCAROLA: If that is information that
16 you obtained in the course of the performance
17 of your responsibilities in representation of
18 any client, I would instruct you not to answer.

19 If that information was obtained
20 through some public source independent of
21 the work that you performed as counsel,
22 then you may respond.

23 THE WITNESS: I cannot respond.

24 BY MR. CRITTON:

25 Q. With regard to the question, I am not

1 interested in what you learned from [REDACTED]. All right.
2 Did you learn from either any correspondence or a
3 telephone call with any third party that whether
4 again prior to the -- let me start again.

5 Prior to the filing of the lawsuit
6 against Jane Doe 1 and Jane Doe 2 against the United
7 States Government, did you learn from any source,
8 maybe a document, maybe a telephone call or a
9 conversation that you had with a third party
10 separate from your client, that [REDACTED]. was a victim or
11 was deemed to be a victim by the United States
12 Government or the United States Attorney's Office?

13 MR. SCAROLA: Same objection and
14 instruction.

15 BY MR. CRITTON:

16 Q. Same question with regard to [REDACTED]. Miller.

17 MR. SCAROLA: Same objection and
18 instruction.

19 BY MR. CRITTON:

20 Q. And same question with regard to Jane Doe.

21 MR. SCAROLA: Same objection and
22 instruction.

23 BY MR. CRITTON:

24 Q. Prior to your filing the lawsuit with
25 United States Government, did you ever any

1 conversations with the United States Attorney's
2 Office --

3 MR. SCAROLA: I assume --

4 BY MR. CRITTON:

5 Q. -- regarding, regarding, regarding the
6 subject of the lawsuit or Jeffrey Epstein?

7 MR. SCAROLA: Same objection and
8 instruction.

9 MR. CRITTON: These are third parties;
10 where is the work product?

11 MR. SCAROLA: Work product has to do with
12 anything that was done in connection with the
13 representation of these three clients. If he
14 had such conversations independent of his
15 representation of those clients, then he can
16 respond to the question.

17 BY MR. CRITTON:

18 Q. Well, let me ask you a broader question.
19 After you filed the lawsuit against the United
20 States of America, were you aware that Marie
21 Villafana or the United States Attorney's Office
22 represented the USA, correct?

23 A. Yes.

24 Q. All right. Did you ever speak with Marie
25 Villafana during, during the pendency of that

1 litigation which is still pending today?

2 MR. SCAROLA: And I assume that question
3 is qualified by inquiring as to whether such a
4 conversation occurred with regard to any of the
5 three individuals who he is representing claims
6 against Mr. Epstein or the U.S. Attorney's
7 Office, correct?

8 MR. CRITTON: Say that again?

9 MR. SCAROLA: Yes, sir. Are you asking
10 whether such conversations occurred that were
11 relevant to his prosecution of the claims on
12 behalf of his three clients?

13 MR. CRITTON: Sure.

14 MR. SCAROLA: Then, then the instruction
15 remains the same. The objection remains the
16 same.

17 BY MR. SCAROLA:

18 Q. So, even if, do you -- even if you talked
19 about it with Mrs. Villafana, even if your client
20 Mr. Edwards spoke with Mrs. Villafana about a
21 scheduling issue, it's your position that that is
22 what, work-product?

23 MR. SCAROLA: That's correct. We are not
24 going to discuss anything that Mr. Edwards did
25 in the course of the prosecution of his claims

1 on behalf of his clients.

2 MR. CRITTON: So, any question that I ask
3 you with regard to conversations that
4 Mr. Edwards had with the U.S.A.O.'S office,
5 whether it was Mrs. Villafana or anyone else
6 from the time, with regard to the Jane Doe 1
7 and Jane Doe 2 versus U.S.A. case, you would
8 instruct Mr. Edwards not to answer those
9 questions?

10 MR. SCAROLA: That is correct.

11 MR. CRITTON: So if I --

12 MR. SCAROLA: Obviously pending --

13 MR. CRITTON: -- let me just finish.

14 MR. SCAROLA: Obviously pending, obviously
15 pending some instructions or guidance from the
16 court with regard to how the court will
17 interpret the work-product privilege in this
18 context. I might also add that it is our
19 position that any such inquiry exerts a
20 chilling effect upon the work that Mr. Edwards
21 continues to do on behalf of his three clients.

22 It is intended as a means to obtain
23 discovery that would not otherwise be
24 available in those pending claims. It is
25 intended to annoy, harass, and embarrass

1 Mr. Epstein in a lawsuit that has
2 absolutely no foundation whatsoever, and
3 was filed for purposes other than a
4 legitimate claim against Mr. Edwards based
5 upon any good faith belief that he engaged
6 in any form of improper or tortious
7 conduct and --

8 MR. CRITTON: Done?

9 MR. SCAROLA: -- those inquires are not
10 reasonably calculated to lead to the discovery
11 of admissible and relevant evidence. So, for
12 all of those reasons, we object.

13 MR. CRITTON: And let me just put on the
14 record very briefly so at least at this point
15 in time this is all information that clearly is
16 relevant to the complaint as it's alleged.

17 I have received a, my client and I
18 have both received a letter from you
19 asserting a motion for fees and costs and
20 certain sanctions under 57.105, by not
21 allowing us to ask what are clearly, I
22 believe, relevant material, basic
23 discoverable information are preventing
24 our ability to get all of the facts here
25 such that we can make a reasonable

1 decision as to whether or not the 57.105
2 motion and letter which you sent to me was
3 filed in good faith or has any basis in
4 it. We're unable then to, we'll be in
5 large part unable to evaluate our
6 position.

7 MR. SCAROLA: And our position is that
8 those are decisions that should well have been
9 made, could have been made, and should have
10 been made before you ever filed the claim.

11 MR. CRITTON: All right. Are we done?

12 MR. SCAROLA: Yes.

13 MR. CRITTON: All right.

14 MR. SCAROLA: At least for now.

15 MR. CRITTON: I'm shocked.

16 BY MR. CRITTON:

17 Q. With regard to, with regard to the claim
18 Jane Doe 1 and Jane Doe 2 that is currently
19 pending -- or let me strike that. Jane Doe 2 --
20 Jane Doe 1 and Jane Doe 2 against the U.S.A. that
21 was filed in July of '08, that case is still
22 pending.

23 A. Okay.

24 Q. Is that correct?

25 A. That was a question, yes.

1 Q. All right. And have any, have you had any
2 discussions -- well, let me strike that. What's the
3 status of that case?

4 A. It's still pending.

5 Q. Other than still pending is a, is there,
6 are there any outstanding motions?

7 A. No.

8 Q. I want to ask, to get back to one question
9 with regard to both the Qtask and with regard to the
10 Fortis system -- well, let me strike that.

11 With regard to the hard copies of the
12 files that you had that is any paper files that you
13 had associated with the Epstein files, where would
14 they have been kept at RRA?

15 A. In a filing cabinet.

16 Q. And were the filing cabinets in your
17 office or were they out in the general hallways?

18 A. They were filing cabinets in my office and in
19 other locations in the office.

20 Q. Okay. With regard to the Epstein related
21 matters, where did you keep those if they were --
22 and by that that is the hard copies, did you keep
23 those solely in your office or would they have been
24 both in your office and in other places throughout
25 RRA?

1 A. There were times when they were in my office
2 and there were times when they were kept in filing
3 cabinets elsewhere on one of the RRA floors. I believe
4 there were five or six floors of RRA

5 Q. Okay. Was there a central storage, say if
6 there were a number of files in this instance
7 relating to Mr. Epstein, could you send those to
8 basically central storage and if you wanted someone
9 could go down and pick them up and bring them up to
10 you?

11 A. I don't know.

12 Q. Well, if you wanted to access something
13 that was in an Epstein file, and it wasn't in your
14 office, how did you access it; that is, a hard copy?

15 A. You're speaking specifically about
16 Mr. Epstein's cases or hypothetically with any cases?

17 Q. No, Mr. Epstein's cases?

18 A. As I sit here right now, I can't say with
19 absolute certainty that I ever had a piece of the hard
20 copy file requested for it to be brought to me.

21 Q. Well, with regard to Mr. Epstein's files,
22 though, if they were in a location, would it be a
23 correct statement that those were not, wasn't a
24 locked location or a secure location within the
25 contents of within the confines of the firm?

1 A. I don't know that that's a correct statement.

2 Q. You don't know one way or the other?

3 A. The law firm was constantly expanding and
4 constantly under construction. For the most part in the
5 beginning the cases were kept in a, in a filing cabinet
6 in my office and later were kept in a filing cabinet, I
7 believe, in a locked storage location in another area of
8 the office.

9 Q. And did any attorney have access to that
10 storage area or do you know?

11 A. I believe any attorney could have had access.

12 Q. And if the attorney could have access, you
13 wouldn't necessarily know about it, true?

14 A. Correct.

15 Q. In the trustee's filing that they made in
16 response to my motion to preserve evidence, they
17 indicated that 13 boxes relating to Jeffrey Epstein
18 had been removed by the FBI or the government when
19 they came into the RRA offices. Do you remember
20 seeing that pleading?

21 A. No.

22 Q. Okay. Are you, were there, in fact, 13
23 boxes of material or at least 13 banker's boxes of
24 material that related to matters directed to,
25 whether, whatever the content related to Mr. Epstein

1 that you were aware of; that is, hard copies?

2 A. I don't know.

3 Q. Okay. Could have been more, could have
4 been less; you just don't know?

5 A. Correct.

6 Q. If I understood your testimony,
7 Mr. Rothstein, Mr. Rosenfeldt, any other attorney or
8 investigator could have accessed those files
9 depending on where they were within the firm, true?

10 A. I am not sure exactly who could have accessed
11 it. You asked me if the attorneys could and the
12 attorneys had swipe cards for various locked areas.
13 Each attorney I believe had access to any area where
14 those files were located. I believe so.

15 Q. Okay. Well, during the time you were
16 there did an individual by the name of Ken Jenne
17 work there?

18 A. Yes.

19 Q. Okay. Did an individual by the name of
20 Mike Fisten work for the firm --

21 A. Yes.

22 Q. -- for RRA? Were they employees of the
23 firm or were they independent contractors?

24 A. I don't know.

25 Q. Okay. During the time they were there,

1 did they also have swipe cards so that they could
2 access different areas in the firm?

3 A. I believe so.

4 Q. With regard to when you joined RRA, did
5 you ever have any further meetings with
6 Mr. Rothstein; that is, from the day you started at
7 RRA, did you ever meet Mr. Rothstein again?

8 A. By meet him again --

9 Q. Did you ever have a meeting with him again
10 regarding your position in the firm?

11 A. No.

12 Q. Okay. Did you ever meet with him and a
13 number of other individuals with regards to firm
14 business?

15 A. No.

16 Q. Firm cases?

17 A. I don't believe so.

18 Q. Was Mr. Rothstein ever present in any
19 meeting where any of your cases were discussed? Let
20 me strike that. Was Mr. Rothstein ever present
21 wherein at any meeting where any of the cases
22 against Jeffrey Epstein were discussed? Don't tell
23 me content; just was he ever present.

24 A. How would I know that? I don't know. He
25 could, he could be in a meeting right now where the case

1 could be discussed for all I know.

2 Q. I'm sorry. Obviously, where you, where
3 you were present. Where you ever present at a
4 meeting where Mr. Rothstein was also present where
5 the Epstein cases were discussed?

6 A. No.

7 Q. Did he ever call you to communicate with
8 you, call you either by phone, video conference, in
9 any fashion to discuss any act aspect of the cases
10 that you had against Jeffrey Epstein?

11 MR. SCAROLA: You can answer that.

12 THE WITNESS: He has communicated about
13 various, about legal issues related to the case
14 as well as commented about the case to me on
15 very few occasions but I would say less than
16 three times.

17 BY MR. CRITTON:

18 Q. During the time that you, from April of
19 '09 through late October of '09, correct?

20 A. In that time period, where, is that when
21 these --

22 Q. Correct.

23 A. -- things happened?

24 Q. Well, that's the time you were there;
25 that's what I am asking.

1 A. When I was there.

2 Q. And do you, can you remember the date, any
3 specific date that you spoke with him?

4 A. No.

5 Q. Do you remember any specific month that
6 you would have had one of the -- well, what did you
7 say something less than five conversations? I don't
8 want to misquote you.

9 A. I said less than three conversations.

10 Q. All right. So, something less than three
11 conversations you had with Mr. Rothstein regarding
12 Epstein cases, either legal issue or a comment, some
13 comment about the case to you, correct?

14 A. Yes.

15 Q. All right. The first time that he ever
16 spoke to you, did he call you or did you call him?

17 A. I, I never called Scott Rothstein about
18 anything. Oh, take that back. About anything related
19 to Jeffrey Epstein.

20 Q. The first conversation that you can recall
21 where either a legal issue or a comment was made
22 about Jeffrey Epstein by Mr. Rothstein to you, he
23 obviously initiated the call?

24 A. It wasn't a call.

25 Q. What was it?

1 A. A comment in passing. And I believe I was
2 sitting at a table in BOVA when he walked over to my
3 table and commented about Jeffrey Epstein.

4 Q. Okay. Who were you there with at the
5 time?

6 A. I don't remember.

7 Q. Were you with some friends? Were you with
8 other lawyers?

9 A. All right. I am jogging my memory. I, I have
10 no idea.

11 Q. What did he say?

12 MR. SCAROLA: To the extent that you can
13 answer that question without disclosing any
14 mental impressions with regard to the lawsuit
15 or any attorney-client privileged
16 communications, you can answer.

17 To the extent that it might invade
18 either the work-product or attorney-client
19 privilege, you should not respond.

20 THE WITNESS: Can I talk to you?

21 MR. SCAROLA: Sure.

22 (A brief recess was held.)

23 MR. SCAROLA: Are we on?

24 THE VIDEOGRAPHER: Yeah.

25 MR. SCAROLA: The record should reflect

1 that we have had an opportunity to consult and
2 I have advised Mr. Edwards that there is no
3 privilege protection for the particular
4 communications involved.

5 BY MR. CRITTON:

6 Q. What did he say?

7 A. He commented to me, I want you to get that
8 pedophile.

9 Q. And your response was what?

10 A. I didn't respond.

11 Q. All right. Second conversation that you
12 can remember, where were you?

13 A. I had just come out of the conference room on
14 the main floor after taking a deposition in another
15 case. And he walked by and said, did you get that F'ing
16 pedophile yet.

17 Q. And your response?

18 A. Again.

19 Q. No response.

20 A. Didn't respond.

21 Q. On the first occasion when he came over
22 and if I understand correctly, all he said was the
23 comment that you referenced and then he left. You
24 didn't respond and then he just made the comment and
25 then left?

1 A. Right. He was walking by in his normal, loud,
2 ostentatious kind of way, greeting everybody in the
3 restaurant. Came over to my table and he feels, at
4 least my impression was obliged to say something to
5 everyone. And that's the comment he said to me.

6 And if you've ever seen him, he is
7 basically always just skipping around and he hoped
8 on over somewhere else. So, yes, it was in,
9 literally in passing.

10 Q. Okay. How, how, how did he even know you
11 had cases involving Mr. Epstein?

12 A. I don't know.

13 Q. Because I think you testified earlier that
14 you had never discussed an Epstein case with
15 Mr. Rothstein one-on-one, correct?

16 A. Absolutely, true.

17 Q. You never discussed an Epstein case or
18 either of your three clients with Mr. Rothstein even
19 with a group of people around, correct?

20 A. Correct.

21 Q. All right. Do you remember a third
22 occasion that he spoke to you regarding Epstein
23 related occasion, cases?

24 A. Anything else that he ever spoke with me about
25 related to Epstein related issues is attorney-client and

1 work-product privileged information that I am not going
2 to divulge.

3 Q. Okay. I am not -- I need to still ask the
4 last question though. I thought you said earlier is
5 that you never had any substantive conversations,
6 maybe I misunderstood, with Mr. Rothstein about the
7 Epstein cases. Did I misunderstand you?

8 A. I don't believe that that was -- I had
9 conversations at a point about legal issues related to
10 Jeffrey Epstein and that's, that's it.

11 Q. Was that a one conversation? Was that a
12 number of conversations that you had where legal
13 issues were discussed as to, separate and apart from
14 the two comments he made about the case to you which
15 you were, you waived any privilege, work-product or
16 attorney-client privilege?

17 A. I, I can't tell you. If you and I this
18 morning had a conversation and then we took a bathroom
19 break, and we had the same continuing conversation, I
20 don't know if that's one conversation or two. But I can
21 tell you the, the only time I remember Scott Rothstein
22 participating in any way, shape, or form in any
23 conversation related to anything substantive dealing
24 with, and not dealing with any specific client but a
25 legal issue, was on a particular one-day event, one-day

1 conversation, if you want to call it.

2 Q. And that's at what time? At that time
3 legal issues were discussed?

4 MR. SCAROLA: Legal issue was the
5 testimony, a particular legal issue.

6 MR. CRITTON: Correct. A legal issue.

7 BY MR. CRITTON:

8 Q. When did that occur; that is, this one-day
9 discussion or a day discussion occur regarding a
10 specific legal issue?

11 A. I don't know.

12 Q. Was he present, he Mr. Rothstein and you
13 present at the same time?

14 A. Yes.

15 Q. Okay. Was anyone else there with you?

16 A. Yes.

17 Q. Who else was present?

18 A. Russ Adler, someone was on the telephone. I'm
19 not remembering who that was. I can't remember. I will
20 tell you if I do remember.

21 Q. Was Bill Berger there?

22 A. No.

23 Q. And, you don't. So, there was you. Well,
24 let me strike that. Where did the conversation take
25 place?

1 A. Scott Rothstein's office.

2 Q. Had you been called up to meet with
3 Mr. Rothstein?

4 A. Yes.

5 Q. Okay. And who contacted you and told you
6 that Mr. Rothstein wanted to see you?

7 A. His, his secretary or paralegal or something.

8 Q. And did you get a call saying Mr.
9 Rothstein would like to see you right now, or was it
10 something that was scheduled?

11 A. It was not scheduled.

12 Q. So, you got a call and somebody told you,
13 come up, Scott, Scott wants to see you.

14 A. I don't remember exactly what was used, but it
15 was I believe, Russell is discussing a legal issue with
16 Scott Rothstein; come to his office.

17 Q. Okay. Was the legal issue, did it involve
18 one of the Epstein cases or the Epstein cases?

19 A. It, it was a legal issue related to -- yes.

20 Q. Okay. How long, how much time did you
21 spend -- well, let me strike that. So, when you
22 went up to Mr. Rothstein's office, it's -- I
23 understand you had to go through some security to
24 get in?

25 A. You've seen the video?

1 Q. I actually haven't.

2 A. Oh, really. Okay. Yeah, it's --

3 Q. In order to get into Mr. Rothstein's --

4 A. It's like a compound.

5 Q. Kind of concern you that this guy running
6 the firm had a compound?

7 A. I -- at the time, no. In retrospect, okay,
8 now that we all know how this whole thing unfolded, but
9 at the time, no.

10 Q. Had you ever worked in an office? And you
11 had worked at some big offices. You worked at the
12 State Attorney's office in Broward County?

13 A. True.

14 Q. You worked for, I think for Kubicki
15 Draper?

16 A. Correct.

17 Q. Did Mr. Kubicki, Gene Kubicki ever have a
18 compound around his office that you had to go
19 through any type of security either people and/or
20 locked doors or secured doors in order to access
21 him?

22 A. No.

23 Q. Had you ever worked other than the Broward
24 County Sheriff's, at the Broward County State
25 Attorney's Office with, and with Kubicki Draper, had

1 you ever worked for a large firm?

2 A. No. You just named all the places I have
3 worked.

4 Q. All right. Is this the first time then
5 that you had been to Mr. Rothstein's office that he
6 called you up there?

7 A. No.

8 Q. You had been in his office before?

9 A. One time.

10 Q. And what was that occasion?

11 A. I was having back surgery, and I went there to
12 tell him I am having back surgery. As you know I had
13 back surgery, and I was telling him I don't know how
14 long I'm going to be off because, you know, the recovery
15 time is different for everybody.

16 Q. Is that the only thing you talked about,
17 the back surgery?

18 A. That's the only thing we talked about.

19 Q. Did the meeting you had with Scott, when
20 you went up, when you were called up to his office
21 that day, did that occur before your back surgery
22 episode or meeting or after?

23 A. After.

24 Q. So, you would, you had back surgery. I
25 think you were out two or three weeks and then you

1 returned to the office, and then that meeting would
2 have occurred?

3 A. Yeah, that's correct.

4 Q. When you, in order to get into the office
5 just as you have described it as a bunker, how many,
6 did you have to go through any security people to
7 get into --

8 MR. SCAROLA: No, I think the description
9 was a compound.

10 MR. CRITTON: I will use compound. Are
11 you more comfortable with compound or a bunker?
12 I have seen it described both ways. I haven't
13 seen the video, but I have seen it described
14 both ways.

15 THE WITNESS: I will describe it for you.
16 Well, first I will answer your question.
17 Security people, I don't know if there was ever
18 a time where one would have to go through
19 security people to get to his office. But on
20 the day or two days that I have been in his
21 office, I did not encounter any security
22 personnel.

23 BY MR. CRITTON:

24 Q. Did you have to be buzzed into the office?

25 A. It was more complicated than that.

1 Q. How many security, different security
2 levels did you have to go through in order to get,
3 to go have your meeting with Mr. Rothstein and
4 Mr. Adler?

5 A. Two.

6 Q. And to your recollection you don't
7 remember ever seeing a security person?

8 A. Right.

9 Q. Okay. Who was in the office?

10 A. Well --

11 Q. I'm sorry.

12 A. I do not remember seeing a security person
13 manning the door or granting access to his office. I
14 saw security people every day in the office of RRA

15 Q. All right. And when you got into the
16 office, Mr. Rothstein was there?

17 A. Yes.

18 Q. Mr. Adler?

19 A. Yes.

20 Q. There was someone on the telephone who you
21 don't recall?

22 A. Yes.

23 Q. Okay. Was there anyone else present?

24 A. Not that I remember.

25 Q. Okay. Was, were there any investigators,

1 was Mr. Jenne or Mr. Fisten present?

2 A. No.

3 Q. So, it was, you, Rothstein, Adler, and
4 someone on the phone; that's it?

5 A. From what I remember.

6 Q. How long did the meeting last?

7 A. I don't know how long the meeting lasted.

8 Q. Five minutes or was it a substantially
9 long meeting?

10 A. Do you want how long I was in the meeting, I
11 can give you an answer. How long the meeting lasted, I
12 have no idea.

13 Q. How long did the meeting last while you
14 were present?

15 A. Less than five minutes.

16 Q. Was the value of any of the three cases
17 discussed at all?

18 A. No.

19 Q. Did Mr. Rothstein, did Mr. Rothstein
20 appear to be knowledgeable about your cases?

21 A. No.

22 Q. Mr. Adler, was Mr. Adler someone that you
23 had discussed the cases with on a somewhat regular
24 basis --

25 MR. SCAROLA: Objection, compound.

1 BY MR. CRITTON:

2 Q. -- not content. Was Mr. Adler someone
3 that you had discussed these Epstein cases with
4 prior to that meeting?

5 A. Yes.

6 Q. Was he familiar with the cases, generally?

7 A. He attended Jeffrey Epstein's deposition, so
8 he heard the questions asked and heard the Fifth
9 Amendment invocation and so the adverse inferences and
10 was therefore informed --

11 MR. CRITTON: Move to strike as
12 nonresponsive.

13 BY MR. CRITTON:

14 Q. My question is was he familiar generally
15 with the subject matter of the litigation against
16 Mr. Epstein?

17 A. In that he read the newspaper articles about
18 molesting a bunch of children, yes, he was familiar with
19 the subject matter.

20 Q. And he read -- did you provide him with
21 copies of the pleadings in these cases when they
22 came to RRA?

23 A. No.

24 Q. What was the topic? What was the legal
25 issue that you discussed -- well, let me strike

1 that. Who raised the legal issue, did
2 Mr. Adler raise it or did Mr. Rothstein?

3 A. I don't know.

4 Q. Okay. Well, how did the, who started the,
5 if you were there I think you said five minutes, who
6 did the talking?

7 A. When I came in the, in the office, it was in
8 the middle of a discussion.

9 Q. Was a question posed to you?

10 A. The question was on the table at least from my
11 perspective coming into the room and was then directed
12 at me, what's the answer to this particular legal issue.

13 Q. And what was the legal issue?

14 MR. SCAROLA: Let's talk for just a
15 second.

16 THE VIDEOGRAPHER: Are we going off the
17 record?

18 MR. SCAROLA: Actually, we don't even have
19 to go off the record. Stay right here.

20 If this was an issue that was
21 identified during the course of the legal
22 proceedings to opposing counsel, then I am
23 going to allow you to you identify the
24 issue without getting into any of the
25 substance of the discussion regarding that

1 issue.

2 If it was not an issue that was
3 identified in the course of the
4 proceedings to opposing counsel, I am
5 going to object and instruct you not to
6 answer on the basis of the work-product
7 privilege.

8 THE WITNESS: Work-product privilege.

9 BY MR. CRITTON:

10 Q. Do you know an individual by the name of
11 Fandry, F-a-n-d-r-y?

12 A. That name doesn't ring a bell right now.

13 Q. Do you know him to be -- does that name
14 mean anything with regard to, as an investigator,
15 Fandry?

16 A. That's a male?

17 Q. Pardon?

18 A. That's a first name or a last name?

19 Q. Last name, Richard Fandry.

20 A. I know an investigator named Rick that did
21 work, was contracted out by RRA to do investigative
22 work. I don't know his last name but --

23 Q. Did, did Rick ever do any work on any of
24 the Epstein cases to your knowledge?

25 A. I believe so.

1 Q. Do you know what the name of his business
2 was?

3 A. No.

4 Q. Is Rick still being employed at the
5 current time by your firm to do investigation?

6 A. No.

7 Q. Is Mr. -- I asked you earlier if you knew
8 Ken Jenne and Michael Fisten and you said yes and
9 you knew that they had an association with RRA; is
10 that correct?

11 A. Yeah, that's correct.

12 Q. And do you know whether they were
13 employees or whether they were independent
14 contractors?

15 A. You asked me that and I still have no idea.

16 Q. Did they have offices within RRA,
17 Mr. Jenne and Mr. Fisten?

18 A. They, Mr. Jenne definitely had an office
19 within RRA Mr. Fisten was normally in the field and I
20 assume he had a place to go in RRA I don't know if you
21 call it an office.

22 Q. Did you ever go --

23 A. That's it.

24 Q. Did you ever go meet with him within RRA?

25 A. Yes.

1 Q. Where did you go -- did you go to an
2 office to meet him?

3 A. Well, I went to a particular area, a locked
4 area that I could get in with my swipe card and there
5 was a, a room like this. Is this an office?

6 Q. Sure.

7 A. Okay. Then yes.

8 Q. If you wanted to contact Mr. Fisten, did
9 you, did you have a number; that is, an inside
10 number?

11 A. I don't know.

12 Q. Did Mr. Fisten do work on the Epstein
13 related cases?

14 A. Yes.

15 Q. Okay. What kind of work did he do?

16 A. Investigator.

17 Q. Meaning what?

18 A. Meaning investigative work.

19 Q. Okay. Has Mr. Fisten continued to do --
20 let me strike that. When RRA imploded in early or
21 in late '09, in October of '09, did Mr. Fisten come
22 to work for your firm?

23 A. Yes.

24 Q. Farmer, Jaffe. Is he an employee of your
25 firm?

1 A. Correct.

2 Q. How about Mr. Jenne, is he currently
3 employed by your firm?

4 A. No.

5 Q. Do Mr. Jenne and Mr. Fisten, to your
6 knowledge, have any association at the current time?

7 A. No.

8 Q. Have, has Mr. Fisten continued to do work
9 on behalf of your firm; that is, investigative work
10 relating to Mr. Epstein?

11 A. What do you mean has he continued to?

12 Q. Has he continued, has Mr. Fisten done,
13 continued to do investigative work since he had been
14 with Farmer Jaffe relating to the Epstein cases?

15 A. On, on many cases and Jeffrey Epstein's case
16 being one of them, yes, he's done some work.

17 Q. Has he, has he as well -- well, let me
18 strike that. Has Ken Jenne done any work for any
19 outside agency, investigative agency or entity, done
20 investigation work relating to Jeffrey Epstein here
21 in the State of Florida?

22 A. I don't, I don't know. I don't talk to him.

23 Q. Have you had any contact -- well, let me
24 strike that. Did you ever have any contact with
25 Mr. Jenne during the time you were at RRA?

1 A. Yes.

2 Q. Did he ever do any work, or did you ever
3 direct him to do any work with regard to the Epstein
4 cases?

5 A. No.

6 Q. Did he know about the Epstein cases?

7 A. Yes.

8 Q. Okay. And how did he know? How did you
9 know he knew? Well, let me strike that. I think
10 you said you never directed him to do any work?

11 A. Right.

12 Q. Okay. And how do you know he was
13 knowledgeable about the Epstein cases?

14 A. I talked to him about it before.

15 Q. Did you discuss the facts and
16 circumstances of the cases with him?

17 A. Of [REDACTED], [REDACTED], and Jane Doe's specific
18 circumstances, no. In fact, I would say, I would
19 highly, it's highly unlikely that he would even know
20 their names.

21 Q. But you have discussed the Epstein cases
22 with him generically?

23 A. Right.

24 Q. And did he approach you about discussing
25 the Epstein cases or did you approach him?

1 A. He would have approached me. I didn't know
2 him.

3 Q. Do you recall why -- let me strike that.
4 Do you recall how long you were at the firm, RRA
5 before he approached you to talk about the Epstein
6 cases?

7 A. My recollection is several months.

8 Q. Okay. On how many occasions did he
9 approach you to talk about the Epstein cases?

10 A. I don't know.

11 Q. More than once?

12 A. Yes.

13 Q. More than twice?

14 A. Yes.

15 Q. More than five times?

16 A. Yes.

17 Q. More than ten times?

18 A. Possibly.

19 Q. Okay. And with regard to Mr. Jenne did
20 you ever give him, was he ever an invite person on
21 your Qtask?

22 A. I do not believe so.

23 Q. Did, did you ever ask Mr. Jenne why he was
24 interested in your Epstein cases?

25 A. No.

1 Q. Okay. And on each occasion he approached
2 you about talking about the Epstein cases?

3 A. On the first I occasion, definitely. I can't
4 say on every occasion that we had a conversation.

5 Q. And if I understood you correctly, you
6 never assigned Mr. Jenne any tasks, any task; is
7 that correct?

8 A. That's correct.

9 Q. Did you find it odd or strange that he
10 would want to talk to you about your Epstein cases?

11 A. No.

12 Q. Did you, did you -- Mr. Jenne reported to
13 whom as you understood?

14 A. I didn't understand anything.

15 Q. Do you know what his position with the
16 firm was?

17 A. No idea.

18 Q. Did he ever offer to help you with the
19 Epstein cases?

20 A. In some respect, I guess so. Generally, you
21 know, I, I can help. This is basically a criminal
22 matter; I can help. You know, that kind of thing. I am
23 not saying those are his exact words but paraphrasing
24 the gist of it, that's what I remember.

25 Q. Okay. Mr. Edwards, did you ever contact

1 the media or the press when, that's located in New
2 York City, the State of New York, about any of the
3 Epstein cases?

4 A. I may have returned telephone calls that were
5 initiated by press to me.

6 Q. My, my question to you was, did you
7 initiate any telephone calls; that is, without
8 returning a call to the, to any member of the media
9 or press in New York regarding the Epstein cases?

10 A. Meaning the first conversation --

11 Q. Right.

12 A. -- between -- yeah. No, I did not.

13 Q. Who contacted you from New York with
14 regard to any Epstein related matter?

15 A. The press.

16 Q. Who?

17 A. I don't remember anybody's name.

18 Q. Give me anybody's name that you can
19 recall.

20 A. George Rush.

21 Q. What media, what did you understand his
22 association?

23 A. I believe New York Daily News.

24 Q. Do you remember when Mr. Rush contacted
25 you?

1 A. No.

2 Q. When Mr. Rush contacted you, do you know
3 why he contacted you; that is, what -- well, let me
4 strike that. When he contacted you, did you take
5 his call right away or was his a call that you had
6 to return?

7 A. I don't remember.

8 Q. Do you remember speaking with a person
9 named John Canally?

10 A. Yes.

11 Q. Okay. What was Mr. Canally's association?

12 A. I don't know.

13 Q. Do you know who he was with at the time?

14 A. No.

15 Q. What did your discussion with Mr. Canally;
16 that is, what was Mr. Canally interested in and what
17 did you tell him?

18 MR. SCAROLA: Objection, compound.

19 THE WITNESS: I, I listened to him more
20 than told him anything.

21 BY MR. CRITTON:

22 Q. Did you provide him any information?

23 A. In the back and forth of the conversation, I,
24 you know, maybe general information that one could read
25 from the newspapers I talked to him about.

1 Q. Did you speak with, other than -- on how
2 many occasions did you speak with Mr. Canally?

3 A. I don't know.

4 Q. On how many occasion's have spoken with
5 Mr. Rush?

6 A. I don't know.

7 Q. More than once with Mr. Rush?

8 A. I would say so, yes.

9 Q. More than five times with Mr. Rush?

10 A. That's approximate, that's approximately
11 correct.

12 Q. Okay. Mr. Canally, did you speak with him
13 on more than one occasion?

14 A. Yes.

15 Q. On how many occasion's have you spoken
16 with him?

17 A. I don't know.

18 Q. Five, two, three, your best estimate?

19 A. More than five.

20 Q. When was the last time you spoke with
21 Mr. Canally?

22 A. 2009.

23 Q. Have you had any contacts with the media
24 or the press during the year 2010, January,
25 February, March, and we're almost, well, we're

1 almost at the end of March. In the last three
2 months, starting in January 1st of 2010, have you
3 had any contact with the press?

4 A. Not that I recall.

5 Q. Has the press contacted you, but you have
6 not returned their calls?

7 A. On hundreds and hundreds of occasions.

8 Q. Well, my question is since the beginning
9 of, since January 1st of 2010 has the press
10 attempted to contact you?

11 A. Yes.

12 Q. And if I understand your testimony, you
13 have not returned any of those calls?

14 A. To the best of my recollection I, I do not
15 remember speaking with anybody from the press during
16 this year, 2010.

17 Q. In 2010, do you have a recollection of
18 having spoken with people but saying you can't quote
19 me, i.e., I have no comment or I will tell you off
20 the record?

21 A. I don't even remember having those
22 conversations with anybody in 2010. If you know of
23 something and can refresh my recollection, I, you may be
24 able to remind me, but I don't think in 2010 I have had
25 any of those conversations.

1 Q. The conversations you had with George
2 Rush, when you returned his call, what did Mr. Rush
3 ask you? What was he inquiring about?

4 A. My response to Jeffrey Epstein's comments.

5 Q. Which comments?

6 A. A telephone conversation initiated by Jeffrey
7 Epstein to George Rush related to the various cases and
8 claims against Mr. Epstein.

9 Q. Did Mr. Rush call you -- I'm sorry, I will
10 improve it. If I understand correctly when Mr. Rush
11 called you, that's the first time you knew who he
12 was?

13 A. I didn't know who he was before he called me,
14 correct.

15 Q. What did Mr. Rush tell you what Jeffrey
16 Epstein had said to him?

17 A. And I'm not sure that that was the first
18 conversation I had with, with George Rush. Like I said
19 I think I've talked to him three or four, five times.

20 Q. Okay. Well, let me see if I can place,
21 can you give me a point in time when you first spoke
22 to Mr. Rush and when you last spoke with him the
23 approximately five times that you related?

24 A. Each of those times were in 2009 between,
25 earliest possible, June, I think, yeah, latest possible,

1 I believe, November.

2 Q. And the first time that Mr. Rush called
3 you, what was the subject?

4 A. Jeffrey Epstein.

5 Q. Okay. I assume you never talked with
6 Mr. Rush about any topic other than Mr. Epstein,
7 correct?

8 A. That's a safe assumption.

9 Q. When he first contacted you, can you
10 differentiate what he said on the first occasion
11 versus a later occasion?

12 A. I, I, no, in chronological order I can't right
13 now. I haven't gone back and thought about this like
14 this before.

15 Q. Did you ever correspond with Mr. Rush or
16 Mr. Canally by e-mail?

17 A. Mr. Rush, I believe that answer is no. With
18 Mr. Canally, yes.

19 Q. And so do you have copies of the e-mails
20 that you and Mr. Canally exchanged?

21 A. No.

22 Q. Okay. Would they have been while you were
23 at RRA, RRA?

24 A. Correct.

25 Q. With regard to Mr. Rush, if you did

1 communicate with him by e-mail, would it be during
2 the time you were with RRA?

3 A. That's correct.

4 Q. Did you communicate with any other member
5 of the press during the time, we'll come back to
6 Mr. Epstein. During the time when you were at RRA,
7 did you communicate with anybody else by, by either,
8 first of all, by e-mail?

9 A. What is your question again? I'm sorry.

10 Q. Okay. Did you -- other than Mr. Rush who
11 you're not sure you communicated by e-mail,
12 Mr. Canally who you are sure you communicated by
13 e-mail during the time you were at RRA, was there
14 any member of the press, TV, written news media,
15 television that you communicated with --

16 A. I'm sure.

17 Q. -- by e-mail?

18 A. I am sure there is.

19 Q. Okay. Do you remember any of their names
20 other than Mr. Rush and Mr. Canally as you sit here
21 today?

22 A. Not as I sit here today, I do not.

23 Q. Did you ever communicate with Jose
24 Lambiet?

25 A. I don't know who that is.

1 Q. He does a Page 2 or something with the,
2 Page 1, Page 2 of the Palm Beach Post?

3 A. No. I'm not, no.

4 Q. Okay. Have you ever spoken with Jane
5 Muskrat (phonetic)?

6 A. Again, I don't know who that is.

7 Q. Have you ever -- did you ever give or
8 allow one of your clients to give an interview to
9 one of the local TV stations?

10 MR. SCAROLA: Objection, compound.

11 THE WITNESS: One of my clients gave an
12 interview to one of the local television
13 stations.

14 BY MR. CRITTON:

15 Q. Which of your clients gave the interview?

16 A. Jane Doe.

17 Q. And did you organize that?

18 A. I assisted.

19 Q. Which, which TV station was it?

20 A. I don't remember.

21 Q. Do you remember who the person was from
22 the TV station that contacted you? Let me strike
23 that. How did it come about that Jane Doe gave an
24 interview to the TV station?

25 A. Various television stations have been

1 interested over the course of these cases in having the
2 clients talk. I was adamant that that was not going to
3 happen and Jane Doe wanted that to happen.

4 Q. How did Jane Doe even know that that
5 opportunity existed? If you didn't want it to
6 happen when the news, when the news people, when the
7 TV stations called you why didn't you just say my
8 clients are not available for interview?

9 A. What's your question?

10 Q. The question is, is, with regard to the
11 T.V. station, you said multiple TV stations wanted
12 to do interviews with your clients. Did I
13 understand you correctly?

14 A. You did.

15 Q. And you said you didn't want any of your
16 clients to do interviews, correct?

17 A. Right.

18 Q. Okay. So, why didn't you just say, no, I
19 am not making any of my clients available?

20 MR. SCAROLA: I am going to object to the
21 extent that that calls for either mental
22 impressions or attorney-client privileged
23 communications and instruct you not to answer.

24 THE WITNESS: I'm not going to answer
25 based on the privilege.

1 BY MR. CRITTON:

2 Q. Jane Doe, though, did give an interview,
3 correct --

4 A. That is correct.

5 Q. -- on TV and they blocked out her face?

6 A. That is correct.

7 Q. Were you there, were you present when she
8 gave the interview?

9 A. Yes.

10 Q. Okay. Did you see the interview on TV?

11 A. No.

12 Q. Did they give you a copy of the tape of
13 the interview?

14 A. I believe a copy of the tape was sent to me.

15 Q. Okay. Do you still have that in your
16 possession?

17 A. No.

18 Q. Who has it?

19 A. I believe it was destroyed.

20 Q. Who destroyed it?

21 A. Nobody destroyed it.

22 Q. Okay. You said, I think you said you
23 believe it's destroyed. How did it come to be
24 destroyed?

25 A. It was sent to me and it was kept in my house

1 as I didn't believe it was any portion of the file and
2 my house flooded and the tape was destroyed.

3 Q. And did you try to play the tape?

4 A. I have never watched the tape.

5 Q. You still have it. You just think it's
6 destroyed?

7 A. No, I don't even have it.

8 Q. You threw it away?

9 A. It wasn't a matter of throwing anything away.
10 My entire house was full with water, every square inch
11 for 12 inches up the wall, and everything was just in
12 mud and got thrown in these huge bins and trashed so --

13 Q. All right. Have you ever spoken with
14 Michelle Daryan?

15 A. Yes.

16 Q. On how many occasions have you spoken with
17 her?

18 A. Several.

19 Q. Have you e-mailed, exchanged e-mails with
20 her?

21 A. Yes.

22 Q. During the time you, only during the time
23 you were with RRA?

24 A. I believe so. There, there could have been,
25 there could have been an e-mail. Oh I only think at RRA

1 I believe that's right.

2 Q. As a result of Jane Doe speaking with the
3 press, did she receive any compensation?

4 A. No.

5 Q. Have any interviews been given separate
6 and apart from the TV interview that Jane Doe gave?
7 Did any of the other, did either of your other two
8 clients, [REDACTED]. or [REDACTED]., ever give an interview to,
9 written to, to the written media, not TV?

10 A. No.

11 Q. With regard to, back to George Rush, you
12 said that Mr. Rush, Mr. Rush contacted you. You
13 recontacted him, correct?

14 A. That's correct.

15 Q. Okay. And what was the subject matter?
16 What was Mr. Rush interested in talking with you
17 about?

18 A. Jeffrey Epstein.

19 Q. Okay. And what, what specifically about
20 Mr. Epstein? How did he even know you existed, did
21 he say?

22 A. I don't know. Or, or if I knew, I don't
23 remember how he knew that.

24 Q. Okay. Did you, did you talk to him?

25 A. Yes, I did talk to him.

1 Q. Approximately, how many, how long have
2 your conversations been?

3 A. Short.

4 Q. And with regard to George Rush, what, you
5 said he was interested in talking about Jeffrey
6 Epstein. What was he interested in?

7 A. I don't remember specifically the issue, but
8 it seemed to me that he came to me with an issue each
9 time, something related to the case.

10 Q. Okay. The case being Mr. Epstein's case
11 or your three cases?

12 A. I think that it was typically in general
13 related to the various criminal acts committed by
14 Jeffrey Epstein against the large number of girls in
15 each of the states that Jeffrey Epstein has lived in. I
16 think that was like the gist of his communication to me.

17 Q. Well, did he?

18 A. Or why he was interested.

19 Q. Did he indicate to you that someone had
20 told him that, that certain acts had occurred in
21 other states or locations other than the State of
22 Florida?

23 A. I can't say with any degree of specificity
24 what was said, but that certainly is the impression that
25 I have right now thinking back. So, I believe that that

1 was something he was conveying to me.

2 Q. Okay. Did he tell you that he had any
3 information that Mr. Epstein had been involved with
4 any other individuals in any other states, females?

5 A. I don't remember.

6 Q. Did you tell him or did you disclose to
7 him that you were aware of Mr. Epstein having been,
8 having assaulted underage females in other states?

9 A. I don't remember.

10 MR. CRITTON: Need to take -- why don't
11 we, why don't you change the tape now?

12 THE VIDEOGRAPHER: We're now off the video
13 record. It's 1:02 p.m.

14 (A luncheon recess was held.)

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