

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

**PROPOSAL FOR SETTLEMENT PURSUANT TO
RULE 1.442, FLORIDA RULES OF CIVIL PROCEDURE
AND §768.79, FLORIDA STATUTES**

Defendant/Counter-Plaintiff, Bradley J. Edwards, by and through his undersigned counsel, states that at least ninety (90) days have passed since the commencement of this action, and there are at least forty-five (45) days remaining before the date set for trial or the first day of the docket on which this case is set for trial, whichever is earlier.

THEREFORE, Defendant/Counter-Plaintiff hereby serves this proposal for settlement pursuant to Florida Rule of Civil Procedure 1.442 and F.S. 768.79. This proposal for settlement must be accepted in writing, within thirty (30) days or it shall be deemed rejected. The Proposal for Settlement is as follows:

1. **PARTY MAKING PROPOSAL: Bradley J. Edwards.**
2. **PARTY TO WHOM THE PROPOSAL IS BEING MADE: Jeffrey Epstein.**
3. **CLAIMS THE PROPOSAL ATTEMPTS TO RESOLVE: All issues and claims for damages asserted by and against the Defendant, Jeffrey Epstein against and by**

Bradley J. Edwards and all issues and claims which could be asserted between Bradley J. Edwards and Jeffrey Epstein whether known or unknown.

4. **TOTAL AMOUNT OF PROPOSAL:** Defendant/Counter-Plaintiff proposes to resolve all claims for damages against Jeffrey Epstein in exchange for payment by or on behalf of Jeffrey Epstein of the sum of **Three Million Nine Hundred Ninety Nine Thousand Dollars (\$3,999,000)**.

A. **NONMONETARY TERMS OF PROPOSAL, IF ANY:**

Dismissal of the pending claims and counterclaims in 15th Judicial Circuit Court Case No. 502009CA040800XXXXMBAG with prejudice and execution of the attached General Releases (Exhibit 1 and Exhibit 2).

B. **AMOUNT PROPOSED TO SETTLE CLAIM FOR PUNITIVE DAMAGES, IF ANY:**

No claim for punitive damages has been asserted as of the date of this proposal; however, a motion by Edwards is pending to assert a punitive damage claim. This proposal would resolve any and all potential liability for punitive damages, although no portion of the funds to be paid is allocated to settle any punitive damage liability.

C. **ARE ATTORNEY FEES PART OF THE PLAINTIFF'S LEGAL CLAIM?** (check one) Yes No

However, any potential claim for attorney fees would be resolved and released by this proposal.

D. AMOUNT PROPOSED TO SETTLE CLAIM FOR ATTORNEY

FEES, IF ANY: \$ -0- . Amount is inclusive of fees and costs.

5. **SERVICE AND FILING:** This proposal shall be served on the party to whom it is made through counsel, but shall not be filed unless necessary to enforce the provisions of Rule 1.442.

6. **WITHDRAWAL:** This proposal may be withdrawn in writing provided the written withdrawal is delivered before a written acceptance is delivered. Once withdrawn, this Proposal is void.

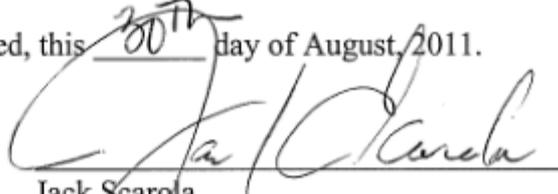
7. **ACCEPTANCE AND REJECTION:** This Proposal shall be deemed by the Defendant/Counter-Plaintiff to be rejected unless accepted by delivery of a written notice of acceptance within thirty (30) days after service of the Proposal. The provisions of Florida Rule of Civil Procedure 1.090(e) do not apply to this Proposal. No oral communications shall constitute an acceptance, rejection or counteroffer of this Proposal.

8. **CONSEQUENCES OF REJECTION:** In the event this proposal is rejected, the Plaintiff, Jeffrey Epstein, is subject to sanctions, including, but not limited to, those as outlined in Rules 1.442(g) and (h) of the Florida Rules of Civil Procedure, Fla. Stat. 768.79 and any other relief Defendant/Counter-Plaintiff is entitled to as a matter of law and which the Court deems just and proper.

9. **GOOD-FAITH:** This Proposal is being submitted with the knowledge, understanding, and consent of the Defendant/Counter-Plaintiff, making this Proposal.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Proposal for Settlement

I HEREBY CERTIFY that a true and correct copy of the foregoing Proposal for Settlement was served to Plaintiff's attorney, Joseph L. Ackerman, Esquire, by Email and U.S. Mail via Certified mail, return receipt requested, this 30th day of August, 2011.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for Bradley J. Edwards

GENERAL RELEASE

TO ALL TO WHOM THESE PRESENTS SHALL COME OR MAY CONCERN:

BRADLEY J. EDWARDS, individually, for and in consideration of the sum of Three Million Nine Hundred Ninety Nine Thousand Dollars (\$3,999,000) lawful money of the United States of America, paid to him on behalf of **JEFFREY EPSTEIN**, the receipt whereof is hereby acknowledged, and for and in consideration of the execution of the General Release attached hereto as Exhibit #2 has remised, released, and forever discharged, and by these presents does for himself, as well as his heirs, survivors, executors, administrators, agents, and assigns, remise, release, acquit and forever discharge **JEFFREY EPSTEIN**, as well as his heirs, survivors, executors, administrators, agents, assigns, attorneys, insurers, and reinsurers (hereinafter referred to as "**Releasee**"), of and from all manner of action and actions, cause and causes of action, suits, debts, dues, sums of money, accounts, reckonings, bonds, bills, specialties, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which **BRADLEY J. EDWARDS, individually**, ever had, now has, or may have against **Releasee** or which his heirs, survivors, executors, administrators, agents, and assigns hereafter can, shall or may have against **Releasee**, whether known or unknown, including but not limited to all claims for compensatory damages, punitive damages, penalties, interest, costs or attorney's fees, past, present and future, and all other damages, without limitation, specifically arising out of those matters described more particularly in the action entitled *JEFFREY EPSTEIN v. SCOTT ROTHSTEIN individually, and BRADLEY J. EDWARDS, individually*, Case No. 502009CA040800XXXXMB-AG, pending in the Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida ("the Action").

I understand and agree that this General Release shall be construed, enforced and interpreted in accordance with the laws of the State of Florida and venue for any action to enforce or construe the General Release shall be Palm Beach County, Florida.

IN WITNESS WHEREOF, I, _____, have hereunto set
_____ hand and seal on this _____ day of _____, 2011.

Signed, sealed and delivered
in the presence of:

WITNESS:

BRADLEY J. EDWARDS

STATE OF FLORIDA }

COUNTY OF _____ }

BEFORE ME, the undersigned authority, personally appeared **BRADLEY J. EDWARDS**, who, upon being first duly sworn according to law, deposes and says that he executed the foregoing **General Release** and that the representations therein are true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED before me this _____ day of August, 2011. **Individual**

Personally Known _____ OR Produced Identification _____

Type And Number of Identification Produced: _____

My Commission Expires:
(seal)

NOTARY PUBLIC
State of Florida at Large

GENERAL RELEASE

TO ALL TO WHOM THESE PRESENTS SHALL COME OR MAY CONCERN:

JEFFREY EPSTEIN, individually, for and in consideration of the execution of the General Release attached hereto as Exhibit #1 has remised, released, and forever discharged, and by these presents does for himself, as well as his heirs, survivors, executors, administrators, agents, and assigns, remise, release, acquit and forever discharge **BRADLEY J. EDWARDS**, as well as his heirs, survivors, executors, administrators, agents, assigns, attorneys, insurers, and reinsurers (hereinafter referred to as "**Releasee**"), of and from all manner of action and actions, cause and causes of action, suits, debts, dues, sums of money, accounts, reckonings, bonds, bills, specialties, covenants, contracts, controversies, agreements, promises, variances, trespasses, damages, judgments, executions, claims and demands whatsoever, in law or in equity, which **JEFFREY EPSTEIN, individually**, ever had, now has, or may have against **Releasee** or which his heirs, survivors, executors, administrators, agents, and assigns hereafter can, shall or may have against **Releasee**, whether known or unknown, including but not limited to all claims for compensatory damages, punitive damages, penalties, interest, costs or attorney's fees, past, present and future, and all other damages, without limitation, specifically arising out of those matters described more particularly in the action entitled *JEFFREY EPSTEIN v. SCOTT ROTHSTEIN individually, and BRADLEY J. EDWARDS, individually*, Case No. 502009CA040800XXXXMB-AG, pending in the Circuit Court of the 15th Judicial Circuit in and for Palm Beach County, Florida ("the Action").

I understand and agree that this General Release shall be construed, enforced and interpreted in accordance with the laws of the State of Florida and venue for any action to enforce or construe the General Release shall be Palm Beach County, Florida.

IN WITNESS WHEREOF, I, _____, have hereunto set
_____ hand and seal on this _____ day of _____, 2011.

Signed, sealed and delivered
in the presence of:

WITNESS:

JEFFREY EPSTEIN

STATE OF FLORIDA }

COUNTY OF _____ }

BEFORE ME, the undersigned authority, personally appeared **JEFFREY EPSTEIN**, who, upon being first duly sworn according to law, deposes and says that he executed the foregoing **General Release** and that the representations therein are true and correct to the best of his knowledge and belief.

SWORN TO AND SUBSCRIBED before me this _____ day of August, 2011. **Individual**

Personally Known _____ **OR Produced Identification** _____

Type And Number of Identification Produced: _____

My Commission Expires:
(seal)

NOTARY PUBLIC
State of Florida at Large