

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

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

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

Case No. 50 2009CA040800XXXXMB AG

RE-NOTICE OF TAKING VIDEO DEPOSITION DUCES TECUM

TO: All Counsel of Record

PLEASE TAKE NOTICE that the undersigned, pursuant to Florida Rule of Civil
Procedure 1.310(b)(4), will take the video deposition of:

<u>NAME</u>	<u>DATE AND TIME</u>	<u>PLACE</u>
AJ DiScala [REDACTED]	Wednesday May 25, 2011 10:30 a.m.	Dewey LeBoeuf 1301 Avenue of the Americas New York, NY 10019

***The deponent has been instructed to bring with him all documents listed in Schedule A
attached hereto.**

upon oral examination before DIAMOND REPORTING AND LEGAL VIDEO, a Notary Public,
or before some other officer authorized by law to take depositions in the State of New York.

The oral examination will continue from day to day until completed. This deposition is being taken for the purpose of discovery, for use at trial or for such other purposes as are permitted under the applicable Statutes, Rules of Civil Procedure or Rules of Court.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

In accordance with the Americans With Disabilities Act, persons in need of a special accommodation to participate in this proceeding shall, within a reasonable time prior to any proceeding, contact the Administrative Office of the Court, 300 North Dixie Highway, Room 300, West Palm Beach, FL 33401, telephone (561)355-2431, 1-800-955-8771 (TDD), or 1-800-955-8770, Via Florida Relay Service.

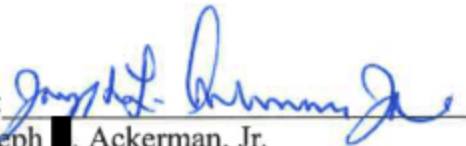
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed, faxed and emailed this 13 day of April, 2011 to :

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

Jack Alan Goldberger, Esq.
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By: 
Joseph L. Ackerman, Jr.
Fla. Bar No. 235954
Lilly A. Sanchez,
Fla. Bar No. 195677
FOWLER WHITE BURNETT P.A.
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West Palm Beach, Florida 33401
Telephone: (561) 802-9044
Facsimile: (561) 802-9976

Attorneys for Jeffrey Epstein, Plaintiff

Cc: Diamond Reporting & Legal Video

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SCHEDULE "A"

1. Any and all documents including but not limited to correspondence and emails by/between you and any of the following attorneys, employees or agents of the former Rothstein law firm regarding investment opportunities in any claim or litigation against Jeffrey Epstein:

- a) Scott Rothstein
- b) Russell Adler
- c) William Berger
- d) Bradley Edwards
- e) Michael Fisten
- f) Kenneth Jenne
- g) David Boden
- h) Deborah Villegas
- i) Andrew Barnett
- j) Patrick [REDACTED]
- k) Richard (Rick) Fandrey
- l) Christina Kitterman

2. Any and all contracts and/or agreements, including all drafts and final versions, which were provided to you by any of the following attorneys, employees or agents of the former Rothstein law firm relating to any potential investment in any claim or litigation against Jeffrey Epstein.

- a) Scott Rothstein
- b) Russell Adler
- c) William Berger
- d) Bradley Edwards
- e) Michael Fisten
- f) Kenneth Jenne
- g) David Boden
- h) Deborah Villegas
- i) Andrew Barnett
- j) Patrick [REDACTED]
- k) Richard (Rick) Fandrey
- l) Christina Kitterman

3. Any and all written notes regarding any meetings you were in attendance with any of the following attorneys, employees or agents of the former Rothstein law firm regarding any potential investment in any claim or litigation against Jeffrey Epstein.

- a) Scott Rothstein
- b) Russell Adler
- c) William Berger
- d) Bradley Edwards

- e) Michael Fisten
- f) Kenneth Jenne
- g) David Boden
- h) Deborah Villegas
- i) Andrew Barnett
- j) Patrick [REDACTED]
- k) Richard (Rick) Fandrey
- l) Christina Kitterman

4. Any and all documents given to you by any of the following attorneys, employees or agents of the former Rothstein law firm regarding any potential investment in any claim or litigation against Jeffrey Epstein

- a) Scott Rothstein
- b) Russell Adler
- c) William Berger
- d) Bradley Edwards
- e) Michael Fisten
- f) Kenneth Jenne
- g) David Boden
- h) Deborah Villegas
- i) Andrew Barnett
- j) Patrick [REDACTED]
- k) Richard (Rick) Fandrey
- l) Christina Kitterman