

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).

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**AMENDED MOTION TO STAY PROCEEDINGS PENDING  
COMPLETION OF ADDITIONAL DISCOVERY  
(AMENDMENTS TO PARAGRAPHS 3 AND 4)**

Counter-Plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an order staying further proceedings with respect to JEFFREY EPSTEIN'S Motion for Attorney's Fees and Costs, and in support thereof would show:

1. EPSTEIN seeks to recover fees and costs against BRADLEY EDWARDS pursuant to a Proposal for Settlement that offered a payment of \$300,000 to BRADLEY EDWARDS in exchange for a dismissal and release of EDWARDS' claims for compensatory and punitive damages against EPSTEIN and EDWARDS' acceptance of a prohibition on EDWARDS, his attorneys, and agents "that they shall not in any method or manner discuss, publish, or disseminate any information concerning the settlement..." The confidentiality clause sought to be imposed by EPSTEIN on EDWARDS, his attorneys and agents also broadly sought to prohibit disclosure of "the reasons for the payment."