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VIA FAX AND U.S. MAIL

September 16, 2010

Joseph L. Ackerman, Jr., Esq. Fowler White Burnett, P.A. 777 S. Flagler Drive, Suite 901 West Palm Beach, FL 33401

Re: Epstein v. Rothstein, et al Our File No.: 291874

Dear Joe:

Enclosed please find Defendant/Counterplaintiff's Motion to Expand Interrogatories, together with a Notice of Hearing for September 23, 2010 at 8:45. If there is a possibility of resolving any of the issues raised in the motion without the necessity of court intervention, please call me.

Since my schedule often makes it difficult to reach me by phone during regular business hours, I invite you, if necessary, to call me at home in the evening at

Sincerely,

JACK SCAROLA JS/mep Enc.

cc: Bradley J. Edwards, Esq.

- ATTORNEYS AT LAW: ROSALYN SIA BAKER-BARNES *F. GREGORY BARNHART T. HARDEE BASS, III LAURIE J. BRIGGS BRIAN R. DENNEY *EARL L. DENNEY, JR. BRENDA S. FULMER JAMES W. GUSTAFSON, JR. JACK R. HILL DAVID K. KELLEY, JR. WILLIAM B. KING *DARRYL L. LEWIS WILLIAM A. NORTON PATRICK E. QUINLAN EDWARD V. RYDZ *DAVID J. SALES *JOHN SCAROLA *CHRISTIAN D. SEARCY *JOHN A. SHIPLEY III CHRISTOPHER K. SPEED BRIAN P. SULLIVAN KAREN E. TERRY *C. CALVIN WARRINER III

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#291874/mep

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).



NOTICE OF HEARING

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the following:

DATE: Thursday, September 23, 2010

TIME: 8:45 a.m.

JUDGE: Honorable David F. Crow

PLACE: 205 N. Dixie Highway, West Palm Beach, FL 33401

ROOM #: 9-C

SPECIFIC MATTERS TO BE HEARD:

Bradley J. Edwards' Motion to Expand Interrogatories

Moving counsel certifies that he or she contacted opposing counsel and attempted to resolve the discovery dispute without hearing.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

***In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding, contact the Court Administrator's office not later than seven (7) days prior to the proceedings. If hearing impaired, contact (TDD) [REDACTED] via Florida Relay.**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 16th day of September, 2010.

[REDACTED]

JACK SCAROLA
Florida Bar No.: 169440
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2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409

[REDACTED]

Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

COUNSEL LIST

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Attorneys for Scott Rothstein

#291874/mep

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).

MOTION TO EXPAND INTERROGATORIES

Defendant/Counterplaintiff, Bradley J. Edwards, by and through the undersigned counsel, moves this Honorable Court pursuant to the provisions of Rule 1.340(a), Florida Rules of Civil Procedure, to increase the number of initial interrogatories permitted herein so as to allow for the filing of interrogatories in accordance with those attached, and in support of this motion, Defendant/Counterplaintiff would show:

1. The Supreme Court has not approved a form of interrogatories for this type of action.
2. The elements of the claims asserted and the nature and complexity of the factual circumstances giving rise to the claims are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.
3. The elements of defenses asserted or expected to be asserted are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Motion to Expand Interrogatories

4. The use of written interrogatories is the least burdensome, least expensive and most expeditious discovery means available to the Defendant/Counterplaintiff by which to obtain necessary information and narrow trial issues.

5. The Plaintiff/Counterdefendant will not be prejudiced through the granting of this motion.

6. The foregoing factors and others to be presented upon hearing of this Motion constitute good cause for increasing the number of initial interrogatories permitted herein.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 16th day of September, 2010.

[Redacted]

Jack Scarola
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Attorney for Bradley J. Edwards

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