

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
█ f., individually,

Defendant(s).

NOTICE OF PRODUCTION FROM NON-PARTY

TO: Tonja Haddad Coleman, Esquire

█; █
Tonja Haddad, █.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301

William Chester Brewer, Esquire

█; █
250 S Australian Avenue, Suite 1400
West Palm Beach, FL 33401

YOU ARE NOTIFIED that after ten (10) days from the date of service of this Notice, if service is by delivery, or fifteen (15) days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue or apply to the Clerk of this Court for issuance of the attached Subpoenas directed to the following individual to produce the items listed at the time and place specified in the Subpoena.

1. Joseph L. Ackerman, Esquire
Fowler White Burnett, █.
515 N. Flagler Drive, Suite 2100
West Palm Beach, FL 33401

2. Robert D. Critton, Esquire
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401
3. Jack A. Goldberger, Esquire
Atterbury Goldberger & Weiss, [REDACTED].
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
4. Roy Black, Esquire
Black Srebnick Kornspan and Stumpf, [REDACTED].
201 South Biscayne Boulevard, #1300
Miami, FL 33131

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 19th day of Sept., 2017.



JACK SCAROLA
Florida Bar No.: 169440
Attorney E-Mail: [REDACTED]; and
mmccann [REDACTED]
Primary E-Mail: [REDACTED]
Searcy Denney Scarola Barnhart & Shipley, [REDACTED].
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: 561-383-9451
Attorneys for Bradley J. Edwards

COUNSEL LIST

William Chester Brewer, Esquire

[REDACTED]; [REDACTED]
250 S Australian Avenue, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-655-4777
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Jack A. Goldberger, Esquire

[REDACTED];
Atterbury Goldberger & Weiss, [REDACTED].
250 Australian Avenue S, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire

[REDACTED]
Farmer Jaffe Weissing Edwards Fistos &
Lehrman, [REDACTED].
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Fred Haddad, Esquire

[REDACTED];
Fred Haddad, [REDACTED].
One Financial Plaza, Suite 2612
Fort Lauderdale, FL 33394
Phone: (954)-467-6767
Fax: (954)-467-3599
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire

[REDACTED];
Tonja Haddad, [REDACTED].
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire

[REDACTED]
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or

**CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for Joseph L. Ackerman, Esquire, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 2017, who:

- is personally known to me; or
- has produced _____ as identification; and who:
- did or
- did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

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., individually,

Defendant(s).

_____ /

SUBPOENA DUCES TECUM TO NON-PARTY

THE STATE OF FLORIDA

TO: Robert D. Critton, Esquire
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, █,.,
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 1:30
█. and to have with you at that time and place the following:

Duces Tecum:

All documents* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data

compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. “Documents” also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this _____ day of _____, 2017.



JACK SCAROLA
Florida Bar No.: 169440
Attorney E-Mail(s): [REDACTED]; and
[REDACTED]
Primary E-mail: [REDACTED]
Searcy Denney Scarola Barnhart & Shipley, [REDACTED].
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: 561-383-9451
Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for Robert D. Critton, Esquire, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 2017, who:

- is personally known to me; or
- has produced _____ as identification; and who:
- did or
- did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

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
█f., individually,

Defendant(s).

SUBPOENA DUCES TECUM TO NON-PARTY

THE STATE OF FLORIDA

TO: Jack A. Goldberger, Esquire
Atterbury Goldberger & Weiss, █.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, █.,
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 10:30
█. and to have with you at that time and place the following:

Duces Tecum:

All documents* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or

- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this _____ day of _____, 2017.



JACK SCAROLA

Florida Bar No.: 169440

Attorney E-Mail(s): [REDACTED]; and

mm [REDACTED]

Primary E-mail: [REDACTED]

Searcy Denney Scarola Barnhart & Shipley, [REDACTED].

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: 561-383-9451

Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for Jack A. Goldberger, Esquire, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 2017, who:

- is personally known to me; or
- has produced _____ as identification; and who:
- did or
- did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

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
█f., individually,

Defendant(s).

_____ /

SUBPOENA DUCES TECUM TO NON-PARTY

THE STATE OF FLORIDA

TO: Roy Black, Esquire
Black Srebnick Kornspan and Stumpf, █.
201 South Biscayne Boulevard, #1300
Miami, FL 33131

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, █, 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 3:30 █. and to have with you at that time and place the following:

Duces Tecum:

All documents* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

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If you fail to:

- 1) Appear as specified; or

- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this _____ day of _____, 2017.



JACK SCAROLA
Florida Bar No.: 169440
Attorney E-Mail(s): [REDACTED]; and
mmc [REDACTED]
Primary E-mail: [REDACTED]
Searcy Denney Scarola Barnhart & Shipley, [REDACTED].
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: 561-383-9451
Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for Roy Black, Esquire, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 2017, who:

- is personally known to me; or
- has produced _____ as identification; and who:
- did or
- did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires: