

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR BROWARD
COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and
PAUL G. CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendants.

_____ /

NOTICE OF TAKING VIDEO DEPOSITION DUCES TECUM

PLEASE TAKE NOTICE that the undersigned attorneys will take the video deposition(s)
of:

| <u>Name and Address</u> | <u>Date and Time</u> | <u>Place of Taking</u> |
|---|---------------------------------------|---|
|  | Saturday, January 16, 2016 9:00 am | Boies, Schiller & Flexner LLP 401 East Las Olas Blvd, Suite 1200 Ft. Lauderdale, FL 33301 (954) 356-0011 |

upon oral examination for purpose of discovery or use as evidence in this action, or for such other purposes as authorized under applicable statutes and/or the Florida Rules of Civil Procedure, before a Notary Public or before some other officer authorized by law to administer oaths, who is not a relative, employee, attorney, or counsel of any of the parties, or a relative, or employee of such attorney or counsel, or financially interested in the action, and pursuant to adjournments, if any, by said office until said testimony shall be completed. You are hereby

notified to be present at the time and place stated and to bring with you the following: **SEE SCHEDULE "A" ATTACHED (Subject to the Court's Order dated November 12, 2015).**

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and accurate copy of the foregoing was served via Electronic Mail through the Court's E-Portal System this 23rd day of December, 2015 to: **Jack Scarola, Esq.**, Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Blvd., West Palm Beach, Florida 33409.

Respectfully submitted,

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SCHEDULE "A"

1. All documents that reference by name, Alan M. Dershowitz,¹ which support and/or confirm the allegations set forth in Paragraphs 24-31 of your Declaration dated January 19, 2015, filed with the United States District Court for the Southern District of Florida, in Jane Doe #1 and Jane Doe #2 v. United States of America, Case No. 08-80736-CIV-MARRA/JOHNSON, [ECF No. 291-1] (the "Federal Action").
2. All photographs and video in the original, native format in which they were taken (not a paper copy) of you with Alan M. Dershowitz.
3. All photographs and video in the original, native format in which they were taken (not a paper copy) not produced in response to Request No. 2, above, of Alan M. Dershowitz at (i) Jeffrey Epstein's Manhattan home in New York City, New York; (ii) Mr. Epstein's home in Palm Beach, Florida; (iii) Mr. Epstein's Zorro Ranch in Santa Fe, New Mexico; (iv) Little Saint James island in the U.S. Virgin Islands; and (v) Mr. Epstein's airplane, on the same date and time that you were also present at such location.
4. All photographs and video in the original, native format in which they were taken (not a paper copy) of you not produced in response to Request No. 3, above, that evidence and/or show you were present at the same location as Alan M. Dershowitz on that same date and time.
5. Any documents and information that support and/or confirm your presence at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when Alan M. Dershowitz was also present.
6. Any documents and information that show Alan M. Dershowitz was present at the various locations named in Paragraphs 24-31 of your Declaration on the particular dates and times when you allege to have been present in your response to Request No. 5, above.
7. All statements, written or recorded, which you have provided to anyone that reference by name, Alan M. Dershowitz.
8. All notes of, or notes prepared for, any statements or interviews in which you referenced by name or other description, Alan M. Dershowitz.
9. All documents concerning any communications by you or on your behalf with any media outlet concerning Alan M. Dershowitz or the Federal Action, whether or not such communications were "on the record" or "off the record."
10. All notes, writings, photographs, and/or audio or video recordings made or recorded by or of you on the dates on which you allege you were present with Alan M. Dershowitz, including but not limited to your calendar, diary or journal entries on those dates,

1 For purposes of this Schedule "A", reference to "Alan M. Dershowitz" herein shall mean and refer to any reference to the Defendant in this action, including but not limited to, as "Alan", "Alan M. Dershowitz", "Professor Dershowitz", or "Dershowitz", and the like.

regardless whether the notes, writings, photographs, and/or audio or video recordings refer to Mr. Dershowitz. To the extent that any responsive materials are photographs or video recordings, please provide them in the original, native format in which they were taken (not a paper copy).

12. All documents relating to your travel to or from locations for those occasions when you allege you were present with Alan M. Dershowitz.
13. To the extent not produced in response to the above list of requested documents, all notes, writings, photographs, and/or audio or video recordings made at any time that refer or relate in any way to Alan M. Dershowitz.
14. All drafts of declarations or affidavits by you that relate in any way to Alan M. Dershowitz and/or Jeffrey Epstein.
15. All documents relating to any telephone, including any cellular telephone, used by you between January 1, 1999 and December 31, 2002.
16. Any diary or journal kept by you between January 1, 1999 and December 31, 2002.
17. All documents concerning any actual or potential book, television or movie deals concerning your allegations about being a sex slave.