

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 COMPEL RESPONSES TO INTERROGATORIES OVER THE
OBJECTIONS OF COUNTER-DEFENDANT JEFFREY EPSTEIN**

BRADLEY J. EDWARDS, by and through his undersigned attorneys, moves this Honorable Court to enter an order compelling Counter-Defendant, Jeffrey Epstein, to answer Interrogatories propounded by Counter-Plaintiff, Bradley J. Edwards, over the Objections of Jeffrey Epstein, and states:

1. Counter-Defendant, JEFFREY EPSTEIN, filed Updated Responses to Net Worth Interrogatories propounded by Bradley Edwards. Almost all of the responses raise privilege objections and provide no substantive information.
2. The objections are not well-taken and should be overruled.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel Answers to Interrogatories Over Objections
of Counter-Defendant, Epstein

3. Movant counsel certifies that a bona fide effort to agree or to narrow the issues on the Motion noticed hereby has been made with the opposing counsel or that because of time considerations such effort has not as yet been possible but will be made prior to the date of the hearing.

WHEREFORE, Counter-Plaintiff moves for an Order requiring Counter-Defendant to answer the Net Worth Interrogatories in full within ten (10) days from the date of the Order, and providing that if said Counter-Defendant fails to serve sworn answers within that time be subject to the provisions of Rule 1.380, Florida Rules of Civil Procedure, and a judgment by default entered in favor of the Counter-Plaintiff, or for such other relief as the Court may deem proper under the laws of the State of Florida and the Florida Rules of Civil Procedure.

Movant counsel certifies, in good faith, they have conferred or attempted to confer with the person or party failing to make the discovery in an effort to secure the information or material without court action.

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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 25th day of AUGUST, 2017.



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