

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  
█, individually,

Defendant(s).

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**REQUEST TO PRODUCE**

Counter-plaintiff, Bradley J. Edwards, by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that JEFFREY EPSTEIN produce and permit Bradley J. Edwards to inspect and copy each of the following documents\*:

1. All invoices, communications, reports, summaries, and other documents of any description constituting, reflecting, or relating directly or indirectly to any effort or the results of any effort to subject Bradley Edwards to surveillance or to otherwise monitor the movements or activities of 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.

Edwards adv. Epstein  
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Request to Produce

“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.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, [REDACTED], 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

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 2<sup>ND</sup> day of October, 2012.

  
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Jack Scarola 750263  
[REDACTED] m  
[REDACTED] m  
[REDACTED] d  
[REDACTED]  
Attorneys for Bradley J. Edwards

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED] n;  
[REDACTED] m  
[REDACTED] v,  
[REDACTED] n e [REDACTED]

Attorneys for Jeffrey Epstein

Lilly Ann Sanchez, Esquire

[REDACTED] m  
[REDACTED] l  
[REDACTED] e, [REDACTED]

Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire

[REDACTED] n;  
[REDACTED] l  
[REDACTED]  
[REDACTED] s e, [REDACTED]  
[REDACTED] e, [REDACTED]

Fred Haddad, Esquire

[REDACTED] w. [REDACTED];  
[REDACTED] m  
[REDACTED]  
[REDACTED] e, [REDACTED]

Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire

[REDACTED] n;  
[REDACTED] m  
[REDACTED] e, [REDACTED]

Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire

[REDACTED] m  
[REDACTED] k  
[REDACTED] e, [REDACTED]

Attorneys for Scott Rothstein