

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,
Plaintiff,

-vs-

SCOTT ROTHSTEIN, INDIVIDUALLY,
BRADLEY J. EDWARDS, INDIVIDUALLY,
AND L.M., INDIVIDUALLY,

Defendants.

- - -

HEARING BEFORE THE HONORABLE DAVID CROW

Monday, March 11, 2013
9:05 a.m. - 9:17 a.m.
PALM BEACH COUNTY COURTHOUSE, COURTROOM 9C
205 North Dixie Highway
West Palm Beach, Florida

Stenographically Reported By:
Paula McGuirk, RPR, FPR
Registered Professional Reporter
Florida Professional Reporter

PROCEEDINGS

- - -

THE CLERK: Epstein vs. Rothstein.

MR. SCAROLA: Good morning. Jack Scarola on behalf of Bradley Edwards.

THE COURT: Give me one second, please.

MR. SCAROLA: Absolutely.

THE COURT: Okay, what do we have?

MR. SCAROLA: Your Honor, this is the Counter-Plaintiff, Bradley Edwards, motion to strike untimely objections, and if I may approach the Court, I have a time line that I hope will be of help to Your Honor.

THE COURT: Okay.

MR. SCAROLA: Your Honor, this motion relates to net worth interrogatories propounded after Your Honor permitted the amendment of this complaint to assert a claim for punitive damages. We served discovery relating to Mr. Epstein's financial circumstances on December 21, '12 following that order, and pursuant to the provision of Rule 1.340 and the 1.350 responses to both of those, discovery requests were due within 30 days.

Within 30 days rather than filing responses, what we received was a motion for protective order.

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APPEARANCES:

On behalf of the Plaintiff:

LAW OFFICES OF TONJA HADDAD COLEMAN, P.A.

[REDACTED]

[REDACTED]

[REDACTED]

BY: TONJA HADDAD COLEMAN, ESQUIRE

On behalf of the Defendants:

SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, P.A.

[REDACTED]

[REDACTED]

BY: JACK SCAROLA, ESQUIRE

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The motion for protective order raised a variety of objections to the discovery. Included among those objections was that the discovery was propounded for purposes of harassment, oppression and embarrassment. Your Honor considered that motion and entered an order on January 29th denying the motion for protective order. That particular order included no time for the provision of the discovery, and we brought that matter -- that is I, on behalf of Mr. Edwards, brought that matter to the Court's attention, and Your Honor entered an order on February 4th compelling responses to the discovery within 20 days.

Within 20 days, rather than receiving discovery responses, what we received from the opposing party were more objections. In fact, there is nothing but objections to the discovery, and there is not -- apart from Mr. Epstein's name -- there is not a single substantive response to any of the questions that were asked with regard to his financial circumstances.

It is our position that all of the objections that were raised after the initial 30 days for filing of objections or responses to the interrogatories are untimely, and that those objections need not be

<p style="text-align: right;">5</p> <p>1 addressed substantively.</p> <p>2 We are not before Your Honor this morning to</p> <p>3 ask the Court to consider the substance of the</p> <p>4 objections, but to strike all objections, except for</p> <p>5 the Fifth Amendment privilege assertion, on the basis</p> <p>6 that those objections are untimely. The significance</p> <p>7 of striking all of the objections, other than the</p> <p>8 Fifth Amendment privilege objection, is that other</p> <p>9 objections cannot be commented upon in the presence</p> <p>10 of the jury. If there are valid legal objections to</p> <p>11 not providing the information, obviously we cannot</p> <p>12 draw adverse inferences from those other objections,</p> <p>13 nor can we comment upon those other objections.</p> <p>14 However, the Defendant's failure to respond to</p> <p>15 this financial discovery on the basis of the Fifth</p> <p>16 Amendment privilege assertion is obviously something</p> <p>17 that can be raised in the presence of the jury, and</p> <p>18 we can draw adverse inferences from his refusal to</p> <p>19 provide any financial information whatsoever. That's</p> <p>20 the purpose of this motion.</p> <p>21 THE COURT: Yes.</p> <p>22 MS. COLEMAN: Good morning, Judge. Tonja</p> <p>23 Haddad Coleman on behalf of Mr. Epstein. First, I'm</p> <p>24 really not quite sure how to respond to this since</p> <p>25 Mr. Scarola has yet, again, filed a motion that</p>	<p style="text-align: right;">7</p> <p>1 is raising a motion for protective order because, and</p> <p>2 I quote, "This follows from the fact that</p> <p>3 Rule 1.280(c) refers to issuance of protective order</p> <p>4 only to protect a party or person from annoyance,</p> <p>5 embarrassment, oppression or undue burden or</p> <p>6 expense." It does not refer to privilege.</p> <p>7 We think the omission was intentional and,</p> <p>8 therefore, the word objectionable in Rule 1.380(d),</p> <p>9 therefore, should be construed as referring only to</p> <p>10 items which are within the scope of discovery; that</p> <p>11 is, not privileged.</p> <p>12 As such, Judge, once you denied our motion for</p> <p>13 protective order, we were still well within our legal</p> <p>14 rights -- our client's legal rights -- to raise any</p> <p>15 objections that were not raised in the motion for</p> <p>16 protective order. This case supports that position.</p> <p>17 We timely filed our objection.</p> <p>18 THE COURT: As I understand it, he is not</p> <p>19 asking me to rule on privilege objections.</p> <p>20 MS. COLEMAN: Those are all the objections.</p> <p>21 There are various --</p> <p>22 THE COURT: You got overbroad, burdensome, not</p> <p>23 calculated to lead to admissible evidence.</p> <p>24 MS. COLEMAN: Judge, I don't know because he</p> <p>25 didn't provide, as one does, the copies of the</p>
<p style="text-align: right;">6</p> <p>1 contains not one rule or case on which he's relying.</p> <p>2 So, I'll address each allegation in turn.</p> <p>3 First, all he states is that our objections are</p> <p>4 untimely. This Court ordered that we respond. Not</p> <p>5 answer, but respond to the discovery requests within</p> <p>6 20 days of the order. The order was entered</p> <p>7 February 4th. As such, our response was due on or</p> <p>8 before Monday, February 25th, since February 24th was</p> <p>9 a Sunday. We timely responded to all discovery</p> <p>10 requests on Friday, February 22nd, actually, making</p> <p>11 them early.</p> <p>12 Furthermore, with respect to the motion for</p> <p>13 protective order, the law is very clear that the</p> <p>14 issues that you must raise in a protective order, and</p> <p>15 the only issues we raised in our motion for</p> <p>16 protective order were on the grounds of annoyance,</p> <p>17 embarrassment, oppression, undue burden. We've only</p> <p>18 raised issues as delineated in Rule 1.380.</p> <p>19 However, within our responses to the discovery</p> <p>20 we did raise many objections, including privilege,</p> <p>21 and I have a case right on point for the Court, and</p> <p>22 which I've taken the time to actually highlight the</p> <p>23 relevant portions, if I may approach. I have a</p> <p>24 Fourth DCA case in which it says, "A timely objection</p> <p>25 is not required to claims to be privileged when one</p>	<p style="text-align: right;">8</p> <p>1 answers to which he is objecting. He's asking you to</p> <p>2 strike all of them. I don't know which ones he wants</p> <p>3 stricken. We raised the privileges.</p> <p>4 THE COURT: Okay. I'm just listening to what</p> <p>5 he said. He said he wants me to strike everything</p> <p>6 except the privilege objections.</p> <p>7 MS. COLEMAN: Well, they're not here. The</p> <p>8 rules -- my understanding of the rules --</p> <p>9 THE COURT: Excuse me. What's not here? I'm</p> <p>10 sorry.</p> <p>11 MS. COLEMAN: The discovery. There's no copy</p> <p>12 of the request in the objections. He wants you to</p> <p>13 strike everything. What is everything?</p> <p>14 THE COURT: He just gave me a copy of it here.</p> <p>15 MS. COLEMAN: Well, he didn't give me a copy.</p> <p>16 THE COURT: Well, it's your responses.</p> <p>17 MS. COLEMAN: I know it's my responses, Judge.</p> <p>18 It wasn't attached to his motion, and it wasn't</p> <p>19 provided to us.</p> <p>20 THE COURT: Okay.</p> <p>21 MS. COLEMAN: His motion doesn't say anything.</p> <p>22 THE COURT: For example, the first one says</p> <p>23 please produce financial statements to any lender</p> <p>24 within the past five years. You have your privilege</p> <p>25 objection, and then you say vague, unartfully</p>

<p style="text-align: right;">9</p> <p>1 drafted, unable to file a response. I don't know how 2 it would be work product. The accountant privilege 3 would not be applicable. So your position is that 4 you have not waived any -- certainly not waived any 5 privilege objections. I understand that. Your claim 6 is that you have not waived any objections? 7 MS. COLEMAN: Yes, Your Honor, we never raised 8 any issue of overly burdensome. We raised the three 9 grounds one can raise in a protective order. We did 10 not raise, in our objection to his discovery 11 requests, any grounds that you had already ruled upon 12 in your motion for protective order. As such, 13 they're timely objections. 14 THE COURT: I honestly don't remember what I 15 ruled or didn't rule. 16 MS. COLEMAN: I have a copy of your order right 17 here. It's attached to our response to his motion. 18 THE COURT: It says -- you've got here 19 overbroad. 20 MR. SCAROLA: Would Your Honor like a copy of 21 the order? 22 THE COURT: Yes. I don't have the motions, so 23 I don't know what you raised in the motions, but, 24 okay, yes, sir, you want to respond? 25 MR. SCAROLA: I would like to respond, Your</p>	<p style="text-align: right;">11</p> <p>1 will have to look at it today. By the way, is your 2 father an attorney, or is that your brother that's an 3 attorney? 4 MS. COLEMAN: Me? 5 THE COURT: Yeah, Haddad. 6 MS. COLEMAN: Yes. 7 THE COURT: Are you related? 8 MS. COLEMAN: I'm related to a lot of 9 attorneys. I don't know which Haddad you're 10 referring. 11 THE COURT: No, I'm sorry, I -- 12 MR. SCAROLA: Mr. Haddad has actually entered 13 an appearance in this case, Your Honor. 14 THE COURT: Is he related to you? 15 MS. COLEMAN: Yes, he is. 16 THE COURT: Oh, okay. I just wondered. It's 17 interesting. Do you have a relative that works in 18 the Court? We have a clerk, an attorney. 19 THE CLERK: Monica. 20 THE COURT: Monica Haddad. Is she related? 21 MS. COLEMAN: No. 22 THE COURT: Because that's not unusual. I 23 mean, it's kind of like a Smith, Jones kind of -- 24 MS. COLEMAN: Which is why for the last decade 25 I've tried using my married name, but it doesn't seem</p>
<p style="text-align: right;">10</p> <p>1 Honor. The Fourth DCA case, which opposing counsel 2 handed me when she handed it to the Court, 3 specifically addresses attorney/client privilege, and 4 says that attorney/client privilege objections are 5 not waived as a consequence of having raised a motion 6 for protective order. The motion expressly states 7 that we are not seeking this Court's ruling on the 8 assertion of Fifth Amendment privilege. We are 9 seeking to strike all other objections as untimely, 10 and it seems strange that the law would develop to a 11 point where no objection is raised substantively. 12 With regard to these requests for financial 13 information, a motion for protective order is filed. 14 It raises substantial grounds, including harassing, 15 oppressive, embarrassing, and, as counsel has said in 16 her argument, overbroad, and then serially permit 17 other objections to be raised far after the 30-day 18 deadline for response has passed. 19 We would ask the Court to grant this motion, 20 strike all objections, except those as to privilege, 21 and with regard to any privilege objection, other 22 than attorney/client privilege, we will raise that by 23 separate motion. 24 THE COURT: Okay, I'm going to have to take a 25 look at this. The responses are 17 pages long, and I</p>	<p style="text-align: right;">12</p> <p>1 to take. 2 THE COURT: Okay. I don't mean to -- you know, 3 I was just interested because it's a -- 4 MS. COLEMAN: Yes. 5 THE COURT: Okay, thank you. 6 MR. SCAROLA: Thank you very much, Your Honor. 7 THE COURT: And did I see something come back 8 from the Fourth? Y'all filed something against me, 9 right? 10 MR. SCAROLA: Yes, they filed a petition for 11 writ of certiorari challenging Your Honor's granting 12 of leave to amend to assert a claim for punitive 13 damages. 14 THE COURT: Well, I thought there was something 15 like somebody tried to recuse -- not recuse -- in 16 fact, the reason I thought it was because I saw it 17 come through, Mr. Haddad, somebody tried to get him 18 kicked off the case. Didn't the Appellate Court say 19 I actually did it right? Am I wrong? 20 MS. COLEMAN: Yes, we didn't appeal that, 21 Judge, because -- 22 MR. SCAROLA: That was not appealed. 23 THE COURT: Oh, okay. 24 MR. SCAROLA: No, the issue that was appealed 25 was the propriety of Your Honor's order granting</p>

1 leave to assert a claim for punitive damages. The
2 petition for writ of certiori was denied as to that
3 matter.

4 THE COURT: Okay.

5 MR. SCAROLA: There was a recent opinion that
6 related to an effort to recuse Attorney Keitel that
7 was just addressed by the Fourth DCA in another
8 matter, so that may have been what Your Honor was
9 seeing.

10 THE COURT: Okay, thank you, guys.

11 MR. SCAROLA: Thank you, Your Honor.

12 MS. COLEMAN: Thank you, Judge.

13 (The hearing concluded at 9:16 a.m.)

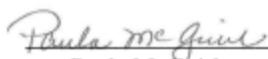
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1 CERTIFICATE OF REPORTER

2 - - -

3 I, Paula McGuirk, Registered Professional
4 Reporter, Florida Professional Reporter, certify that I
5 was authorized to and did stenographically report the
6 foregoing proceedings and that the transcript, pages 1
7 through 13, is a true and complete record of my
8 stenographic notes.

9
10 Dated this 13th day of March, 2013.
11
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16 
17 Paula McGuirk
18 Registered Professional Reporter
19 Florida Professional Reporter
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23
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 24th 6:8

25th 6:8
 29th 4:6

3

30 3:23,24 4:23
 30-day 10:17
 301 2:4
 315 2:3
 33301 2:4
 33409 2:9

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4th 4:12 6:7

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9C 1:17
 9:05 1:16
 9:16 13:13
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