

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL  
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA  
CASE NO. 50 2009CA040800XXXXMB AG  
Complex Litigation, Fla.R.Civ.Pro. 1201

JEFFREY EPSTEIN,  
Plaintiff,

-vs- VOLUME II OF II

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS,  
individually, and L.M. individually,

Defendants.

VIDEOTAPED DEPOSITION OF BRADLEY J. EDWARDS, ESQUIRE

Tuesday, March 23, 20010  
10:00 - 5:07 p.m.

2139 Palm Beach Lakes, Boulevard  
West Palm Beach, Florida 33401

Reported By:  
Cynthia Hopkins, RPR, FPR  
Notary Public, State of Florida  
Prose Court Reporting  
Job No.: 1333

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I N D E X

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EXAMINATION DIRECT CROSS REDIRECT  
CONTINUED EXAMINATION OF  
BRADLEY J. EDWARDS, ESQUIRE

BY MR. CRITTON 151

E X H I B I T S

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APPEARANCES:

On behalf of the Plaintiff:

ROBERT D. CRITTON, JR., ESQUIRE  
BURMAN, CRITTON, LUTTIER & COLEMAN, LLP

and

JACK ALAN GOLDBERGER, ESQUIRE  
LUTTERMAN, GOLDBERGER & NEISS, P.A.

and

On behalf of the Plaintiff:

ALAN M. DERSHOWITZ, ESQUIRE  
HARVARD LAW SCHOOL

On behalf of the Defendant:

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

ALSO PRESENT:

Jeffrey Epstein  
Joseph Kozak, Videographer  
Prose Reporting Services

PROCEEDINGS

- - -

THE VIDEOGRAPHER: We're now on the record  
at 1:54 p.m. Volume 2.

CONTINUED DIRECT EXAMINATION  
BY MR. CRITTON:

Q. Mr. Edwards, when we broke, we were  
talking a little bit about, we were talking about  
George Rush and different, many people that you had  
spoken with and you said you had spoken with  
Mr. Rush approximately five times, correct?

A. Correct.

Q. With regard to Mr. Rush, did you ever  
provide him with any documents?

A. I don't believe so.

Q. Did you tell Mr. Rush, did you EVER advise  
or did Mr. Rush ever ask you who your clients were,  
I mean not by name but as to how your clients  
factored into any of the conversations that you were  
having?

A. I don't remember that.

Q. Do you recall discussing with Mr. Rush  
Ghislaine Maxwell? Or in fact, let me ask it this  
way: Did you talk with Mr. Rush about Ghislaine  
Maxwell in any way?

1 (Pages 148 to 151)

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1 A. I'm not sure.  
 2 Q. Why would you -- did any of your clients  
 3 claim or have any of your clients claimed to have  
 4 any contact with Ghislaine Maxwell at all?  
 5 A. That is something that certainly calls for  
 6 attorney-client privilege and not something that I am  
 7 going to be answering today.  
 8 Q. With regard to at least you have attended  
 9 the deposition of both Jane Doe and of [REDACTED] correct?  
 10 A. Yes.  
 11 Q. Okay. And have you heard them reference  
 12 Ghislaine Maxwell during the course of those  
 13 depositions?  
 14 A. No.  
 15 Q. Would it be a correct statement that none  
 16 of the three of your clients -- let's take a look at  
 17 the two that have testified. Both of the two that  
 18 have testified, Jane Doe and [REDACTED], have testified  
 19 that they did not ever take, travel with or were  
 20 transported in any [REDACTED] by Mr. Epstein, correct?  
 21 A. No, that is incorrect.  
 22 Q. Okay. Did, who, which?  
 23 A. I believe.  
 24 Q. I am sorry?  
 25 A. I guess the transcript will speak for itself.

1 A. I don't remember that subject coming up in the  
 2 conversations with Mr. Rush. Had he asked -- I, I don't  
 3 remember that conversation.  
 4 Q. You're not denying it. You are just  
 5 saying you don't remember it or are you --  
 6 A. Correct.  
 7 Q. -- saying it didn't happen?  
 8 A. No. I am saying I just don't remember.  
 9 Q. Did you, did you tell Mr. Rush that  
 10 Mr. Epstein had transported females on his plane for  
 11 the purposes of having sex with other individuals?  
 12 A. I don't know.  
 13 Q. Well, why --  
 14 A. I just don't remember.  
 15 Q. If Mr. Rush would testify that you told  
 16 him that other females had traveled on Mr. Epstein's  
 17 plane and had had sex during the time they were on  
 18 the planes, why would you have had that discussion  
 19 with him?  
 20 A. You're asking a hypothetical if I said that,  
 21 why would have I have said that?  
 22 Q. Well, let me rephrase it this way: With  
 23 Mr. Rush, if I asked you to assume that he would  
 24 testify that you, you told him about the  
 25 transportation, that Mr. Epstein transported other

1 I don't remember their specific --  
 2 Q. Is it your belief that Jane Doe ever  
 3 traveled with Mr. Epstein on his plane?  
 4 MR. SCAROLA: Excuse me, is the question  
 5 limited to the testimony --  
 6 MR. CRITTON: Correct.  
 7 MR. SCAROLA: -- that has been given?  
 8 MR. CRITTON: Correct.  
 9 THE WITNESS: No. I do not believe she  
 10 testified that she traveled with Mr. Epstein on  
 11 his plane.  
 12 BY MR. CRITTON:  
 13 Q. All right. And same would be true with  
 14 [REDACTED], she did not testify that she traveled with Mr.  
 15 Epstein on his plane, true?  
 16 A. I believe that's true as well.  
 17 Q. Okay. Are you aware of any other  
 18 information from any other source that either Jane  
 19 Doe or [REDACTED] traveled on Mr. Epstein's plane?  
 20 A. No.  
 21 Q. Did you, did you indicate to -- well, let  
 22 me strike that. Did you tell Mr. Rush that none of  
 23 your clients had ever traveled with Mr. Epstein on  
 24 his plane or any, on his plane or with him in any  
 25 fashion, in any other manner?

1 women on the plane to have sex with them, what  
 2 information did you have that was the basis for that  
 3 claim at that time?  
 4 MR. SCAROLA: I am going to object to the  
 5 form of the question. It assumes facts not in  
 6 evidence. It has no proper predicate.  
 7 BY MR. CRITTON:  
 8 Q. Mr. Edwards, did you have Ghislaine  
 9 Maxwell served in this case with a subpoena?  
 10 A. Yes.  
 11 Q. For what purpose? I mean, obviously to  
 12 take her deposition.  
 13 A. Exactly, to take her deposition.  
 14 Q. All right. Do you, is she neither, would  
 15 you agree that neither Jane Doe nor [REDACTED] have  
 16 testified to any, that they had any connection  
 17 whatsoever with Ghislaine Maxwell?  
 18 A. Yes, I would agree.  
 19 Q. And what, what was, what is the purpose;  
 20 that is, with regard to your three clients and only  
 21 your three clients is they -- what connection if  
 22 any, did Ghislaine Maxwell have to those  
 23 individuals?  
 24 MR. SCAROLA: Objection, work-product.  
 25 Instruct you to not answer.

2 (Pages 152 to 155)

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1 BY MR. CRITTON:  
 2 Q. When you originally started working with  
 3 the Rothstein firm, did you have any discussions  
 4 with Mr. Rothstein regarding how your cases would be  
 5 funded; that is, your personal, your personal injury  
 6 cases and specifically the cases relating to  
 7 Mr. Epstein?  
 8 A. No.  
 9 Q. Okay. With regard to, prior to taking  
 10 your cases to, prior to starting at RRA, you were  
 11 responsible for the funding of your personal injury  
 12 cases or any contingency fee case, correct?  
 13 A. Right.  
 14 Q. And I assume you had either your own  
 15 personal funds or you had a line of credit or both?  
 16 A. Right.  
 17 Q. And when you came to RRA and you brought  
 18 the cases with you; that is, the personal injury  
 19 cases and as well, the Epstein cases, were you  
 20 reimbursed for the costs that you had already  
 21 expended thus far on those cases?  
 22 A. No.  
 23 Q. Did you request that you be reimbursed?  
 24 A. Yes.  
 25 Q. And with, to whom was the request made?

1 A. I didn't do that.  
 2 Q. You didn't. Did you choose not to do  
 3 that?  
 4 A. No. I, I, the statement was made to me by  
 5 Scott Rothstein that the costs would be reimbursed. And  
 6 I anticipated that the costs would be reimbursed. I was  
 7 there for a fairly short period of time and I didn't  
 8 know Scott Rothstein personally. So, I didn't go to him  
 9 additionally to tell him something that we already had a  
 10 meeting of the minds about.  
 11 Q. Well, how much in costs did you have  
 12 outstanding at the time from your cases, including  
 13 the Epstein cases when you went to the firm, RRA, in  
 14 April of '09?  
 15 A. I don't know the total.  
 16 Q. Was it \$1,000? Was it \$50,000? Was it  
 17 \$100,000?  
 18 A. More than 100.  
 19 Q. And did you have that both from, was it,  
 20 the debt, was that comprised of both your own money  
 21 and as well as LOC, line of credit money through a  
 22 bank?  
 23 A. Correct.  
 24 Q. Was it more than 150?  
 25 A. I'm not sure.

1 A. Directly to Scott Rothstein.  
 2 Q. Was that at the ten minute meeting that  
 3 you had?  
 4 A. Yes.  
 5 Q. At BOVA?  
 6 A. Yes.  
 7 Q. And what did he say?  
 8 A. No problem.  
 9 Q. He said he would reimburse you?  
 10 A. Correct.  
 11 Q. And did that, in fact, take place?  
 12 A. No.  
 13 Q. And how did you attempt to get reimbursed  
 14 for the costs that you had thus far incurred on your  
 15 personal injury cases including Mr. Epstein's case  
 16 when you went, when you started at RRA?  
 17 A. What do you mean?  
 18 Q. Well, you said that Mr. Rothstein agreed  
 19 in the ten minute conversation that RRA would  
 20 reimburse those costs?  
 21 A. Correct.  
 22 Q. You go to RRA in April of '09, and I  
 23 assume you had to ask someone and say, look, I had a  
 24 conversation with Scott Rothstein. He said he would  
 25 reimburse my costs.

1 Q. Was it someplace between 100 and \$200,000  
 2 your best estimate?  
 3 A. That is my best estimate.  
 4 Q. Did you find that to be a significant  
 5 amount of money?  
 6 A. Of course.  
 7 Q. Okay. And you said you were at RRA for  
 8 only a short period of time. In fact, you were  
 9 there April, May, June, July, August, September,  
 10 October. You were there seven months, true?  
 11 A. Yes.  
 12 Q. Okay. And at no time, even though  
 13 Mr. Rothstein said he would reimburse those funds or  
 14 the firm would reimburse those funds to you, at no  
 15 time during those seven months which you have  
 16 described as a short period of time, did you ever  
 17 make a request that you be reimbursed; is that  
 18 correct?  
 19 A. I never made a, well, I don't know the process  
 20 for getting reimbursed, but I never made a formal  
 21 request. I said it to, at least to Russell Adler on  
 22 several occasions. And it was always told to me, don't  
 23 worry about it; the firm is growing; there is a lot of  
 24 things to deal with right now; he operates under the  
 25 system of fairness; you will get reimbursed.

3 (Pages 156 to 159)

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1 And obviously nobody expected the ending  
 2 to the law firm that ultimately occurred.  
 3 Q. With regard to the case, I assume you  
 4 settled a couple of personal injury cases during the  
 5 seven months you were there, yes?  
 6 A. Yes, you assume that.  
 7 Q. That's correct? Let me ask the question.  
 8 Did you settle any contingency fee cases during the  
 9 seven months that you were at the RRA firm?  
 10 A. Yes.  
 11 Q. And when you settled those cases did you,  
 12 and they closed, they were settled through, did you  
 13 have any control of the trust account?  
 14 A. No.  
 15 Q. Okay. Settlement monies come in on a  
 16 personal injury case. What did you do with the  
 17 money once the, once the client had endorsed the  
 18 check?  
 19 A. I, I didn't personally do anything with the  
 20 money. It was not handled by me.  
 21 Q. Okay. Were you there --  
 22 A. That's why I'm confused. Did I settle the  
 23 case? I mean, Rothstein Rosenfeldt Adler firm settled  
 24 personal injury cases while I was there. There were no  
 25 cases that were solely my cases. They were firm cases.

1 A. Well, you've thrown a lot of things in there.  
 2 Travel expenses come back with your receipts, hand them  
 3 over to, I would hand them over to my secretary. And  
 4 she would get them to the appropriate place in the  
 5 machine known as Rothstein Rosenfeldt Adler. And in my  
 6 next -- and I would get a check, I believe.  
 7 Q. All right. How about depositions, I mean  
 8 during the time that we, we took depositions from  
 9 the time you were at RRA, transcripts were ordered  
 10 of depositions. They were expedited of various  
 11 hearings. You took trips. You took a trip to New  
 12 York to take the deposition of Mark Epstein,  
 13 correct; all those things occurred?  
 14 A. Yes, all of those things occurred.  
 15 Q. So, when you would get a bill in for the  
 16 trip for to go up and see Mark Epstein, or to take  
 17 Mark Epstein's deposition, you had travel costs  
 18 associated with that and you had plane fare,  
 19 taxicab, hotel, whatever else you had, correct?  
 20 A. I had costs associated with that.  
 21 Q. All right. And when you met with Mr.  
 22 Rothstein initially, what was your understanding or  
 23 did you have an understanding as to how costs would  
 24 be handled; that is, how they would be paid on cases  
 25 that you brought to the firm?

1 Q. Let me rephrase the question. You  
 2 brought, you brought cases to the firm, correct?  
 3 A. That is correct.  
 4 Q. Of any of the cases that you brought, did  
 5 you settle those cases?  
 6 A. No.  
 7 Q. Okay. So, you never had an instance -- so  
 8 there was never a set of circumstances where you  
 9 would have been reimbursed for costs as a result of  
 10 a settlement?  
 11 A. That's correct.  
 12 Q. All right. And, and so during the seven  
 13 months that you were there, you were never  
 14 reimbursed a nickel of the one to \$200,000 that you  
 15 had outstanding in costs?  
 16 A. That is correct.  
 17 Q. All right. With regard to the costs that  
 18 were to be incurred for prosecuting the cases,  
 19 specifically the Epstein cases, what was your  
 20 understanding -- was that ever discussed with  
 21 Mr. Rothstein at the ten-minute meeting?  
 22 A. Repeat that. I'm sorry.  
 23 Q. Sure. How were, how were costs  
 24 investigation costs, deposition costs, travel  
 25 expenses to be reimbursed?

1 A. It was unspoken but I had some understanding  
 2 just based on logic.  
 3 Q. Separate and apart from logic, did anybody  
 4 tell you that you had; that is, that RRA would pay  
 5 all of the costs associated with prosecution of the  
 6 Epstein cases?  
 7 A. Did anybody tell me? No.  
 8 Q. Okay. Were you ever required to draw  
 9 against either your personal funds or your personal  
 10 LOC after you started with RRA to fund the Epstein  
 11 cases?  
 12 A. I don't know how to answer your question,  
 13 Mr. Critton, because if I were to go out of town and  
 14 purchase a plane ticket, yeah, I would purchase that  
 15 personally and then I would be reimbursed. If I ordered  
 16 a deposition transcript, which is a totally different  
 17 category, that gets billed to the firm. I never see the  
 18 bill or anything else. So, you're just throwing a bunch  
 19 of things together that don't necessarily go together.  
 20 I am trying my best for you.  
 21 Q. No, that's fine. Commonly in a personal  
 22 injury closing, you would see the recover, you would  
 23 see a list of the costs. The costs would include  
 24 court reporters, investigation fees, subpoenas,  
 25 things of that nature, correct?

4 (Pages 160 to 163)

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1 A. I have seen them before, yes, sir.  
 2 Q. Okay. And as well there would be  
 3 reimbursable expenses such as when you went to New  
 4 York and took Mark Epstein's deposition. You, you  
 5 paid for the expense up front but, in fact, it was  
 6 then reimbursed by the firm, correct?  
 7 A. Now we're specifically, specifically talking  
 8 about Mark Epstein's deposition, yes, that, what you  
 9 just said is correct.  
 10 Q. Okay. Not only was the, and if I  
 11 understand your testimony is the deposition was paid  
 12 for directly by the firm. With regard to your  
 13 travel, any hotel, other expenses that you had, you  
 14 put in a request for reimbursement and the firm  
 15 would reimburse you?  
 16 A. Correct.  
 17 Q. All right. And with regard to those  
 18 costs, you said you and Mr. Rothstein never had a  
 19 discussion about that; is that correct?  
 20 A. Correct.  
 21 Q. All right. But you did speak with  
 22 Mr. Adler about how costs would be handled on your  
 23 cases including Mr. Epstein's case after you started  
 24 with RRA?  
 25 A. Correct.

1 responsibility to pay those bills.  
 2 Q. And is that what Russell Adler told you?  
 3 A. Yes.  
 4 Q. Did you ever discuss that with anyone else  
 5 in the firm or just Russell Adler?  
 6 A. Just Russell Adler.  
 7 Q. So, if the bill came in for one of those  
 8 types of costs, you would give to your secretary or  
 9 would she handle it automatically?  
 10 A. I never would see the bill. Why would it come  
 11 into my name? It just didn't do -- that never happened.  
 12 It was billed to Rothstein Rosenfeldt Adler.  
 13 Q. So, you would never see the bill that came  
 14 in?  
 15 A. Correct.  
 16 Q. -- even if it was a RRA attention Brad  
 17 Edwards, you wouldn't see that?  
 18 A. Presuming that happened, attention, Brad  
 19 Edwards, I still never saw it. No, I never saw a bill  
 20 to my recollection right now the whole time I was at  
 21 Rothstein Rosenfeldt Adler.  
 22 Q. Did Mr. Rothstein ever discuss with you  
 23 whether there would be a budget associated with how  
 24 much money you could spend on a particular case?  
 25 A. No.

1 Q. Okay. And is he the only one who  
 2 explained what the procedure was?  
 3 A. Yes.  
 4 Q. And what did he tell you? Well, let me  
 5 ask you this: Did he tell you what; that is, that  
 6 the firm would pay for all of the reimbursements  
 7 either costs and/or reimbursements for costs that  
 8 were incurred in prosecuting the Epstein files and  
 9 any other files that you had?  
 10 A. Can you split this question up so that we're  
 11 not talking about reimbursement and costs and things  
 12 like that.  
 13 Q. Sure. With regard to costs such as  
 14 depositions --  
 15 A. Okay.  
 16 Q. -- court reporters, court reporter fees,  
 17 video depositions, transcripts of hearing, whether  
 18 they were expedited or whether they were asked on a  
 19 routine basis?  
 20 A. Right.  
 21 Q. Where would the -- who was responsible for  
 22 paying those bills?  
 23 A. The bills would, to my to the best of my  
 24 knowledge would be billed to the law firm of Rothstein  
 25 Rosenfeldt Adler, and it would be their financial

1 Q. Okay. Did anyone at the firm ever talk to  
 2 you about whether or not there would be a budget  
 3 associated with how much you could spend on an  
 4 Epstein case or any personal injury case?  
 5 A. No.  
 6 Q. In terms of authorization, if you wanted  
 7 to order a deposition expedited or if you wanted to  
 8 pay for a specific expense, whether it was an  
 9 outside investigator or to send an investigator to a  
 10 location, whose decision was that? Is that you and  
 11 you alone to incur that cost?  
 12 A. Which question do you want me to -- you asked  
 13 a bunch of things there that some of them may have been  
 14 my decision. Other parts of that would obviously be  
 15 somebody else's. But you're throwing five or six items  
 16 in there and you want me to give you an answer.  
 17 Q. Let me break it them down. With regard to  
 18 any costs that you wanted to incur, incur relating  
 19 to a Jeffrey Epstein matter, was there an  
 20 authorization process; that is, did you have to get  
 21 someone's okay before you could spend X amount of  
 22 dollars?  
 23 A. No.  
 24 Q. Okay. It was, and who told you that you  
 25 never had to get an approval for any expense

5 (Pages 164 to 167)

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1 associated with the Jeffrey Epstein case?  
 2 A. I didn't say that anybody did. So, no,  
 3 nobody, nobody.  
 4 Q. You could just spend whatever money you  
 5 wanted to in prosecuting your cases; is that  
 6 correct?  
 7 A. No, I didn't say that either.  
 8 Q. What was the procedure then?  
 9 A. That if I was at a deposition and there was a  
 10 need in my judgment for the transcript to be expedited  
 11 then I would order it expedited and nobody ever told me  
 12 that they had a problem with my judgment as to those  
 13 things. And not as to those things. As to that thing  
 14 which we were talking about which right now is  
 15 expediting deposition transcripts.  
 16 Q. With regard to -- so any, how about an  
 17 expense associated with hiring, with either  
 18 directing -- well, let me strike that. With regard  
 19 to Epstein, did, were you ever required or did you  
 20 ever hire outside investigators to do work  
 21 associated with the Epstein case?  
 22 By outside I mean someone who was not an  
 23 employee of RRA and now I mean dealing with the time  
 24 that you were at RRA  
 25 A. Right. And your question is did I ever hire

1 Q. Did you meet, did you know Mr. Fisten  
 2 before you started working at RRA?  
 3 A. Same answer, no.  
 4 Q. No. All right. And Mr. Fisten, did you  
 5 direct Mr. Fisten to do investigations in Martha's  
 6 Vineyard?  
 7 A. No.  
 8 Q. Did you direct Mr. Fisten to do  
 9 investigations in California?  
 10 A. I directed Mr. Fisten to interview people and  
 11 ultimately it was learned that they lived in California.  
 12 Q. And did Mr. Fisten go to California to  
 13 interview those individuals?  
 14 A. To the best of my knowledge he did.  
 15 Q. Okay. And who did he go and interview?  
 16 MR. SCAROLA: That is work-product and I  
 17 instruct you not to answer.  
 18 BY MR. CRITTON:  
 19 Q. Did Mr. Fisten interview a person by the  
 20 name of Michael Sanka (phonetic)?  
 21 MR. SCAROLA: That is work-product and I  
 22 instruct you not to answer.  
 23 MR. CRITTON: Did Mr. Fisten interview a  
 24 individual by the name of Michael Friedman  
 25 (phonetic)?

1 an outside investigator to perform work on Jeffrey  
 2 Epstein's case?  
 3 Q. Correct?  
 4 A. The answer is no.  
 5 Q. Were, were all the investigations that  
 6 were done during the time that you were employed by  
 7 RRA, were they done by in-house investigators?  
 8 A. I don't know.  
 9 Q. Well, if you wanted investigation done on  
 10 Mr. Epstein, how would you go about authorizing that  
 11 or directing that that be done?  
 12 A. I would ask one of the investigators to do it.  
 13 Q. So, you would direct the specific  
 14 investigator?  
 15 A. Yeah. There were plenty of times where I  
 16 directed the specific investigator. I want you to talk  
 17 to this witness or so-and-so, yes, just like you would  
 18 in any case.  
 19 Q. In this particular instance associated  
 20 with Mr. Epstein, what investigators worked on  
 21 Mr. Epstein's case during the time you were at RRA?  
 22 A. If you want an exclusive list, I don't know.  
 23 Q. I want to know?  
 24 A. I can tell you Michael Fisten did because I  
 25 communicated with him directly.

1 MR. SCAROLA: That is work-product and I  
 2 instruct you not to answer --  
 3 MR. CRITTON: Mr. Fisten --  
 4 MR. SCAROLA: -- except to the extent as  
 5 may have already been disclosed to the defense  
 6 in any of the three cases that are currently  
 7 pending. Any and all questions about  
 8 investigative work will meet with the same  
 9 objection and same instruction.  
 10 BY MR. CRITTON:  
 11 Q. Did you direct Mr. Fisten that he could  
 12 represent that he was an agent of the FBI in  
 13 interviewing individuals in California?  
 14 A. Of course not.  
 15 Q. Did you -- and if in fact Mr. Fisten  
 16 represented he was an agent of the FBI, you would  
 17 find that reprehensible, true?  
 18 A. This is some hypothetical question that I do  
 19 not believe exists.  
 20 Q. I'm asking you to assume that Mr. Fisten  
 21 represented that he was an agent of the FBI. You  
 22 would find that type of conduct by the investigator  
 23 to be inappropriate, correct?  
 24 A. I'm not going to render an opinion on a  
 25 hypothetical that doesn't exist.

1 Q. So, you're refusing to answer that  
 2 question?  
 3 A. You're asking me about my definition of  
 4 reprehensible as it pertains to a specific hypothetical  
 5 that you've just created.  
 6 Q. Let me ask you --  
 7 A. Now, you want me to try to analyze that  
 8 particular hypothetical and tell you whether it meets  
 9 the definition of reprehensible?  
 10 Q. I will let you -- if Mr. Fisten, if I ask  
 11 you to assume that Mr. Fisten represented to a  
 12 witness out in California that he was an agent or  
 13 working for the FBI, would you find that conduct  
 14 appropriate by Mr. Fisten?  
 15 MR. SCAROLA: And I will tell you that you  
 16 are not obliged to answer hypothetical  
 17 questions.  
 18 THE WITNESS: And therefore I am not going  
 19 to answer that question.  
 20 BY MR. CRITTON:  
 21 Q. If Mr. Fisten represented that he was  
 22 associated with the Miami-Dade Police Department,  
 23 Miami-Dade County Police Department, would you find  
 24 that conduct inappropriate?  
 25 MR. SCAROLA: Same instruction and I would

1 Q. Could he -- is it your --  
 2 A. How would I know associate, he may have been?  
 3 Q. Let me ask you this, was he employed by  
 4 the Miami-Dade Police Department in addition to RRA  
 5 during the time he worked there?  
 6 A. To the best of my knowledge, no.  
 7 Q. Did -- with regard to Mr. Epstein's cases  
 8 was there any type of cost account set up for, for  
 9 them?  
 10 A. I don't know.  
 11 Q. Could you access any of the financial  
 12 files within the RRA firm?  
 13 A. No.  
 14 Q. Could you access any files that were  
 15 associated with your specific, excuse me, clients or  
 16 your specific case such as if you wanted to know how  
 17 much in costs had been incurred by Mr. Epstein -- on  
 18 Jane Doe's case while at the RRA firm, could you  
 19 request that, could you access that information?  
 20 A. I don't know.  
 21 Q. Did you ever try to access that  
 22 information?  
 23 A. No.  
 24 Q. At any time did you request that anybody  
 25 provide you copies of what the costs were associated

1 also observe with regard to each of the  
 2 hypothetical questions that you are asked that  
 3 they are incomplete. And without knowing all  
 4 of the surrounding circumstances, it would be  
 5 impossible for any witness to pass judgment  
 6 upon what may have occurred.  
 7 BY MR. CRITTON:  
 8 Q. So, Mr.-- would it be a correct statement  
 9 at least as you understood it, Mr. Edwards, that  
 10 Mr. Fisten was not an agent, was not an FBI agent  
 11 during the time that he worked for RRA?  
 12 A. You're asking me was he an FBI agent or did he  
 13 work for RRA He worked for RRA  
 14 Q. Correct. He was not an FBI agent, true,  
 15 to the best of your knowledge during the time he  
 16 worked for RRA  
 17 A. Okay.  
 18 Q. I am not talking about any other time  
 19 period right now.  
 20 A. Okay. Then the answer is he was not an FBI  
 21 agent at the time he was working for RRA  
 22 Q. During the time he worked for RRA he as  
 23 well was not associated with Miami-Dade Police  
 24 Department, correct?  
 25 A. Oh, I don't know that.

1 with Mr. Epstein's cases?  
 2 A. No.  
 3 Q. Since you left the firm have you requested  
 4 any type of detailed billing or cost analysis such  
 5 as to the cost of any of the costs that were  
 6 incurred on any of Mr. Epstein's cases?  
 7 A. Of course.  
 8 Q. Okay. And did you receive those costs?  
 9 Did you receive that information?  
 10 A. Yes.  
 11 Q. And what costs have been incurred in the  
 12 cases, in the Epstein cases associated up -- let me  
 13 strike that. What costs, what is the total amount  
 14 of costs that were incurred in the Epstein cases  
 15 during the time that those files existed in the RRA  
 16 firm?  
 17 MR. SCAROLA: If you're able to answer  
 18 that question with regard only as to amount  
 19 without specifying any of the specific cost  
 20 expenditures, then I think we can answer that  
 21 question only as to amount.  
 22 THE WITNESS: And the question as to the  
 23 aggregate in the three cases?  
 24 MR. CRITTON: Correct.  
 25 THE WITNESS: Because I can't delineate

1 for you.  
 2 MR. CRITTON: Your best estimate.  
 3 THE WITNESS: Okay. I believe more than  
 4 \$300,000.  
 5 BY MR. CRITTON:  
 6 Q. With regard to, if investigation was done  
 7 on, on a Epstein case, was the investigator charged,  
 8 that is for his time, as an example Mr. Fisten, if  
 9 he did work in California would his time, I'm not  
 10 talking about his expenses, would that be billed as  
 11 a cost to the file?  
 12 A. I don't know.  
 13 Q. On the cost that you received, well, let  
 14 me strike that. If I understood it, up to 300,000  
 15 approximately \$300,000 that's been spent on the  
 16 Epstein file, were you able to look --  
 17 A. It would be more than that. I am just saying  
 18 it's at least \$300,000.  
 19 Q. Something between three and \$400,000,  
 20 could it --  
 21 A. Something that I would say is definitely  
 22 between 300 and \$500,000, but I'm not sure. It could be  
 23 301. It could be 450. I really don't know.  
 24 Q. When was the last time that you looked at  
 25 that ledger or the printout associated with the

1 firm had you, you had spent some of your own money  
 2 and/or LLC money on the files; is that correct?  
 3 A. That's correct.  
 4 Q. Approximately how much is that amount?  
 5 A. I'm, I'm not sure. I think as you're aware  
 6 most of the depositions and costly work that was done on  
 7 the files happened to have been done during that time  
 8 period for all of the respective cases or claims against  
 9 Mr. Epstein during that time period of last summer of  
 10 2009.  
 11 Q. All right. But in terms of your costs  
 12 prior to coming to RRA, what's your best estimate of  
 13 the costs that you have paid either out of pocket or  
 14 are responsible to a bank to repay?  
 15 A. I don't know.  
 16 Q. More than 25,000, less than 25,000?  
 17 A. I'm not sure.  
 18 Q. More than 100,000?  
 19 A. No.  
 20 Q. More than 50,000?  
 21 A. I don't know.  
 22 Q. That's a record obviously you could pull  
 23 up, correct?  
 24 A. Correct.  
 25 Q. All right. Now, with regard to, prior to

1 Epstein files?  
 2 A. I have never looked at the printout.  
 3 Q. Okay. How, how do you know what is amount  
 4 is then? That is how do you have the estimate of it  
 5 being between 350, I'm sorry between 300 and  
 6 \$500,000, the cost associated with Epstein?  
 7 A. I asked a paralegal within my current firm for  
 8 the total amount of costs on these three cases that is  
 9 being claimed by Rothstein Rosenfeldt Adler. And I  
 10 remember the cost number in the aggregate being given to  
 11 me reflecting an amount what I just told you.  
 12 Q. Have you requested a copy of the -- let me  
 13 strike that. Did she say she had, that is did  
 14 she -- did you actually receive a document that  
 15 reflects the breakdown of the costs from the  
 16 trustee?  
 17 A. I personally have not seen that.  
 18 Q. Okay. Has your firm received it?  
 19 A. I don't know.  
 20 Q. I assume -- would it be a correct  
 21 statement that the three to \$500,000 is, includes  
 22 only the time between April of '09 and October of  
 23 '09 when you were with the firm?  
 24 A. It's a good question. I, I believe so.  
 25 Q. And approximately, prior to joining the

1 your coming to RRA, had there been any investigation  
 2 work that you had done on the Epstein files -- and  
 3 let me strike that. Had you hired or retained an  
 4 investigator to do any work for you on the Epstein  
 5 files prior to coming to RRA?  
 6 A. I don't think so.  
 7 Q. All right.  
 8 A. It would have been around that time. I don't  
 9 remember whether the initial investigator was hired by  
 10 me from my previous, from my solo firm or was hired by  
 11 Rothstein Rosenfeldt Adler. I can't say.  
 12 Q. Who was the first investigator that you  
 13 believe was involved in investigating the Epstein  
 14 cases? Just a name not topic?  
 15 MR. SCAROLA: Work-product, instruct you  
 16 not to answer.  
 17 BY MR. CRITTON:  
 18 Q. Was the first person that was retained as  
 19 an investigator someone who ultimately became  
 20 employed by RRA?  
 21 MR. SCAROLA: You can answer that.  
 22 THE WITNESS: No.  
 23 BY MR. CRITTON:  
 24 Q. The, the person who you hired to -- and by  
 25 investigation I mean something other than looking up

1 an address to serve a subpoena or, or doing some  
 2 minimal background.  
 3 A. I am glad you clarified because I am using  
 4 that same definition.  
 5 Q. All right. So, it's, it's your best  
 6 recollection that you did or did not hire an  
 7 investigator to do real investigative work with,  
 8 associated with Mr. Epstein prior to joining RRA?  
 9 A. I believe I did, but it was after a time when  
 10 I had, I was contemplating or at least to myself had  
 11 committed to going to RRA. So, it was within that time  
 12 period I believe that I hired that person prior to RRA.  
 13 Q. When you then went to -- now you had  
 14 committed to go to RRA or at least mentally  
 15 committed to go to RRA. As soon as you started with  
 16 RRA, did you terminate the services of that  
 17 investigator?  
 18 A. No.  
 19 Q. Did that investigator continue to do work?  
 20 A. Yes.  
 21 Q. Okay. Has, does he or she or it continue  
 22 to do work today for you?  
 23 A. No. On Mr. Epstein's case you're asking,  
 24 right?  
 25 Q. Yes, sir.

1 MR. CRITTON: You are claiming  
 2 work-product?  
 3 MR. SCAROLA: Yes.  
 4 BY MR. CRITTON:  
 5 Q. The investigators, did you understand them  
 6 to be salaried employees of RRA?  
 7 A. I really have no idea.  
 8 Q. Did you ever ask them?  
 9 A. No.  
 10 Q. Do you know whether the, do you have any  
 11 knowledge as to whether the investigators kept time  
 12 records?  
 13 A. I do not have that knowledge.  
 14 Q. In terms of when an investigator would  
 15 come back -- well, do you know how the investigators  
 16 were paid?  
 17 A. With money.  
 18 Q. From RRA?  
 19 A. I would presume. Totally speculation.  
 20 Q. Would the RRA -- were the investigators  
 21 for RRA bonused?  
 22 A. I have no idea.  
 23 Q. Did you ever discuss with Mr. Fisten what  
 24 his financial compensation was associated with RRA?  
 25 A. No.

1 A. No.  
 2 Q. Okay. For how long a time period did that  
 3 person continue to do the work before it got  
 4 transferred to Mr. Fisten or other investigators?  
 5 A. Question doesn't make sense.  
 6 Q. Okay. How long did the investigator that  
 7 you may have hired prior to joining RRA work on the  
 8 Epstein files before you ceased that work after you  
 9 started working for Epstein in April of '09? I'm  
 10 sorry, for RRA in '09.  
 11 A. The person was hired in either March or April  
 12 of 2009, which is why I can't say with absolute  
 13 certainty whether I was at RRA or not. And that person  
 14 continued to do investigative work in some capacity  
 15 probably throughout the entire time that I was at RRA.  
 16 Q. Were all of the bills for that  
 17 investigator paid by RRA?  
 18 A. Yes.  
 19 Q. With regard to the payments for the  
 20 investigators -- well, let me strike that. Who  
 21 other than Mr. Fisten from an investigator, from an  
 22 internal investigator at RRA employee worked on  
 23 doing investigation on the Epstein files?  
 24 MR. SCAROLA: Same objection, same  
 25 instruction.

1 Q. Did, did you ever promise either  
 2 Mr. Fisten or any other investigator that when the  
 3 case settled, they would get a bonus from an Epstein  
 4 case?  
 5 A. No.  
 6 Q. Okay. Did Mr. Fisten ever inquire of you  
 7 as to whether he would get a bonus if, in fact, the  
 8 cases on which he worked including the Epstein cases  
 9 settled for a favorable verdict or result came in?  
 10 A. No.  
 11 Q. Did you have any understanding from either  
 12 your conversations from Mr. Rothstein whether  
 13 investigators were bonused based upon the work that  
 14 they did?  
 15 A. Excuse me?  
 16 Q. Did you ever have an understanding from  
 17 Mr. Rothstein that, that investigators would be  
 18 bonused from cases on which they worked based upon  
 19 their work product or their contribution?  
 20 A. No. I had no understanding.  
 21 Q. Did you, from -- I assume you've read a  
 22 number of the news reports associated with  
 23 Mr. Rothstein and the implosion of the firm?  
 24 A. Okay.  
 25 Q. I assume you have seen a number of them?

1 A. What do you mean by a number?  
 2 Q. More than one.  
 3 A. Yes, I have seen more than one.  
 4 Q. Have you seen articles were it's alleged  
 5 that investigators that were employed by Rothstein,  
 6 by RRA would go through the garbage of prospective  
 7 Defendants to search for incriminating or favorable,  
 8 incriminating evidence against the Defendant or  
 9 favorable evidence for a Plaintiff who might be  
 10 working or who might be a client of the firm?  
 11 A. I have not seen an article saying that. I  
 12 think I have heard your client say that before.  
 13 Q. Separate and apart --  
 14 A. Right.  
 15 Q. You don't have to rely on anything my  
 16 client has said before, the testimony --  
 17 MR. SCAROLA: I am sure we won't.  
 18 MR. CRITTON: I am confident of that.  
 19 BY MR. CRITTON:  
 20 Q. In terms of, were you aware from the  
 21 articles, did you see in the article -- let me  
 22 strike that. Did you ever direct your investigators  
 23 to go through Mr. Epstein's trash?  
 24 MR. SCAROLA: I am going to object,  
 25 work-product, attorney-client privilege.

1 BY MR. CRITTON:  
 2 Q. Have you directed, did you ever direct --  
 3 this is the investigators during the time you were  
 4 at RRA and that's the question you're claiming the  
 5 privilege over, correct?  
 6 MR. SCAROLA: I am claiming the privilege  
 7 with respect to any action that was taken by  
 8 Mr. Edwards or at Mr. Edward's direction in --  
 9 MR. CRITTON: Tell you what, I will  
 10 withdraw the last question.  
 11 MR. SCAROLA: -- in connection with the  
 12 investigation in prosecution of the claims  
 13 against Mr. Epstein.  
 14 BY MR. CRITTON:  
 15 Q. Let me make my question clear,  
 16 Mr. Edwards. With regard to your investigators, you  
 17 gave direction with regarding the Epstein cases,  
 18 during the time you were with RRA did you ever tell  
 19 them or direct them to go through Mr. Epstein's  
 20 trash?  
 21 MR. SCAROLA: Same objection, same  
 22 instruction.  
 23 BY MR. CRITTON:  
 24 Q. Did you ever direct the investigators to  
 25 go through the trash of the lawyers who were

1 representing Mr. Epstein including myself?  
 2 MR. SCAROLA: Same objection, same  
 3 instruction.  
 4 BY MR. CRITTON:  
 5 Q. Did you ever?  
 6 MR. SCAROLA: Mr. Edwards will not answer  
 7 any questions regarding what he did or didn't  
 8 do.  
 9 MR. CRITTON: I understand. I just want  
 10 to make it certain it's for the court on some  
 11 of these issues.  
 12 MR. SCAROLA: Well, for the court I am  
 13 telling you he is not going to answer any of  
 14 those questions. And continuing to ask them in  
 15 light of the fact that we have told you and  
 16 made it clear the scope of our assertion of  
 17 privilege serves no useful purpose.  
 18 BY MR. CRITTON:  
 19 Q. Mr. Edwards, at any time, did you -- well,  
 20 let me strike that. Did you ever direct the  
 21 investigators to, during the time you were at RRA,  
 22 to conduct a surveillance on Mr. Epstein's property?  
 23 MR. SCAROLA: Same objection, same  
 24 instruction.  
 25

1 BY MR. CRITTON:  
 2 Q. Since the time you have left RRA in your  
 3 current firm, have you conducted surveillance on Mr.  
 4 Epstein's property?  
 5 MR. SCAROLA: Same objection, same  
 6 instruction.  
 7 BY MR. CRITTON:  
 8 Q. Have you instructed anyone, either of the  
 9 in-house investigators to conduct surveillance of  
 10 Mr. Epstein's property?  
 11 MR. SCAROLA: Same objection, same  
 12 instruction.  
 13 BY MR. CRITTON:  
 14 Q. Have you authorized investigators employed  
 15 by RRA, either employees of the firm or an outside  
 16 investigation firm, to walk around the perimeter of  
 17 Mr. Epstein's home on or about March 17th of 2010?  
 18 MR. SCAROLA: Same objection, same  
 19 instruction.  
 20 THE WITNESS: What's the date?  
 21 MR. CRITTON: March 17th 2010.  
 22 MR. SCAROLA: St. Patrick's Day. Did you  
 23 employ any leprechauns?  
 24 THE WITNESS: Actually --  
 25

1 BY MR. CRITTON:

2 Q. With regard to the, with regard to the  
3 investigators, with regard to the investigation  
4 bills that would come in from outside investigators,  
5 specifically the one that you -- well, let me strike  
6 that.

7 The investigator that you hired before you  
8 went to RRA, I think you testified that bill was  
9 paid by RRA, correct?

10 A. Yes.

11 Q. All right. And in terms of the  
12 investigators who were employed by RRA for whatever  
13 investigation you directed them to do, those  
14 individuals were also paid from funds from RRA,  
15 correct?

16 A. During the time period when I was at RRA  
17 you're asking about specifically, correct?

18 Q. Correct.

19 A. Then the answer is, yes.

20 Q. Was there any specific cost account that  
21 was set up for Mr. Epstein's cases?

22 A. I don't know.

23 Q. Did you ever speak with the --

24 A. Again we're talking about the time period at  
25 RRA?

1 Q. Okay. Well, if you could authorize any  
2 expenditure that you wanted and nobody ever told you  
3 not to, that you couldn't spend the particular  
4 money, what controls, if any, existed with regard to  
5 monies spent on the Epstein cases?

6 A. The presupposition that you just created is  
7 incorrect, so I cannot answer that question. You began  
8 with I have no limit to how I can spend money and that  
9 there is no regulation. I mean, that's just not true,  
10 so I don't understand what to tell you.

11 Q. What limits if any did you have in  
12 spending money in prosecuting Mr. Epstein's case?

13 A. We went through expediting transcripts and I  
14 used my own judgment.

15 Q. I understand that.

16 A. If we have another specific example, I will  
17 address it and I will tell you whether I had that  
18 authority or somebody else may have had that authority.  
19 But specifically related to expediting transcripts and  
20 things involving depositions, ordering depositions, I  
21 used my judgment and it was never questioned.

22 Q. Separate and apart from transcripts, if,  
23 if -- you've testified that the expenditures for  
24 costs that the firm or the trustee is seeking back,  
25 at RRA is seeking back, is seeking relating to any

1 Q. At RRA

2 A. Okay.

3 Q. During the time you were at RRA did you  
4 ever speak with the accounting department or the  
5 accounting department ever call you to talk about  
6 the amount of costs, assuming they were something  
7 between 300 and \$500,000 that were being expended on  
8 Mr. Epstein files?

9 A. No.

10 Q. Did, did anyone at the firm ever call you  
11 to discuss the issue of the amount of costs between  
12 300 and \$500,000 that were being incurred to  
13 prosecute Mr. Epstein's cases?

14 A. No.

15 Q. Okay. Who had checked -- did you have any  
16 check-signing authority at RRA?

17 A. No.

18 Q. Who did sign the checks?

19 A. I don't know. I was --

20 Q. In terms of the, the work that was being  
21 done or the, the work that was, that is the costs  
22 that were being incurred including reimbursable  
23 costs, did you understand that you had a, basically  
24 an unlimited budget to prosecute those cases?

25 A. No.

1 recovery in any Epstein cases is between three and  
2 \$500,000, correct?

3 A. Correct.

4 Q. All right. So, separate and apart from  
5 expedited transcripts or video depositions or  
6 serving subpoenas, that, there has to be, you know,  
7 hundreds of thousands of dollars in additional  
8 expenses that were associated with prosecuting  
9 Mr. Epstein's cases, correct?

10 A. Correct.

11 Q. And with regard to those types of  
12 expenditures that are in the hundreds of thousands  
13 of dollars, who authorized those types of  
14 expenditures?

15 A. I don't know.

16 Q. Well, you said that you used judgment  
17 certainly with regard to transcripts. So, who, if,  
18 if spending an extra two, three, \$400,000 separate  
19 and apart from transcripts, serving subpoenas is not  
20 a limitless budget, how would you describe it; that  
21 is, what controls if any did you have in prosecuting  
22 the Epstein cases?

23 A. First, I haven't seen the delineation of that  
24 amount and I don't know that we agree with Rothstein  
25 Rosenfeldt Adler as to their costs, but that is what

1 they're claiming. I never juxtaposed that with what I  
2 believe should be the proper amount. But beginning with  
3 the fact that I do recognize that as the amount that  
4 they are claiming, I was not aware that the costs were  
5 that high.

6 The cases were firm cases, paid for by the  
7 firm. I was simply an employee and I made judgment  
8 calls. If somebody had told me at any given time,  
9 we shouldn't serve these subpoenas, or we shouldn't  
10 take this deposition, I wouldn't have done it.

11 Q. In fact, with regard to -- well, let me  
12 ask you this: Were any informants, did you  
13 authorize your investigators to hire informant,  
14 informants?

15 MR. SCAROLA: Same objection, same  
16 instruction.

17 BY MR. CRITTON:

18 Q. Did you authorize your investigators to do  
19 electronic eve's dropping?

20 MR. SCAROLA: Same objection, same  
21 instruction.

22 BY MR. CRITTON:

23 Q. You indicated that you were just an  
24 employee, correct?

25 A. Yes.

1 suggests that those terms are mutually  
2 exclusive.

3 THE WITNESS: That was a part of my answer  
4 is that, I don't know --

5 MR. CRITTON: I am shocked to hear that.

6 THE WITNESS: I don't know that being an  
7 employee means that you can't also be a  
8 partner. There are equity partners and  
9 non-equity partners to nearly every single  
10 large firm, so I was a non-equity partner  
11 otherwise known as a salaried employee. That's  
12 just the way it was.

13 BY MR. CRITTON:

14 Q. But your card just reflected partner as  
15 did your --

16 A. Rather than that whole script I just told you.

17 Q. Right. Rather than the qualifying  
18 provisions.

19 A. Yes, you're right. The qualifying positions  
20 didn't make the card.

21 Q. With regard to the monies that was, that  
22 were being paid by, by Rothstein, I'm sorry, by the  
23 RRA firm for the costs -- let me strike that.

24 During the time that you were at the RRA firm, the  
25 seven months that you were there from April through

1 Q. Okay. In fact, you, on various documents  
2 reflected that you were a partner of the firm,  
3 correct?

4 A. Yes, document, documents do reflect that  
5 title, of course, yeah.

6 Q. And if I had asked for a card during the  
7 time that you started at RRA up until the time of  
8 the implosion of the firm in late October of '09,  
9 would your card have also reflected that you were a  
10 partner of the firm?

11 A. I think you did request a card. I think I  
12 gave it to you and I believe that it did say partner on  
13 it.

14 Q. And you would agree that at least up until  
15 the time of the implosion of RRA you held yourself  
16 out to the public, and including other lawyers, as  
17 being a partner of RRA, true?

18 A. What do you mean by held myself out to the  
19 public?

20 Q. You called yourself a partner. You didn't  
21 say I'm an employee; I'm not a partner, correct?  
22 You held yourself out to the public as being a  
23 partner?

24 MR. SCAROLA: I'm going to object to the  
25 form of the question to the extent that it

1 the end of October, do you recall any significant  
2 settlements that were coming into the firm; that is,  
3 that were publicized?

4 A. Do I recall significant settlements --

5 Q. Correct.

6 A. -- coming into the firm that were publicized?

7 Q. Correct?

8 A. I believe, I can't say with any degree of  
9 specificity whether I remember anything that falls into  
10 all of those categories.

11 Q. Now, I forgot my question for a minute.  
12 If I understand your answer, and assuming I remember  
13 my question, Mr. Edwards, you don't recall any  
14 significant settlements coming into the firm that  
15 were, that were publicized either internally within  
16 the firm or within the newspapers; is that a fair  
17 statement?

18 A. Fair statement.

19 Q. Where did you think all of the money that  
20 was coming from -- let me strike that. At that time  
21 how many lawyers were there in the Fort Lauderdale  
22 office; that is, during the time you were there?

23 A. I don't know.

24 Q. Best estimate?

25 A. Seventy.

1 Q. Okay. And the support, how many floors  
 2 did RRA occupy in the Fort Lauderdale --  
 3 A. I believe six.  
 4 Q. And approximately how many square feet on  
 5 each floor?  
 6 A. I don't know. A lot.  
 7 Q. More than 10,000 square feet on each  
 8 floor?  
 9 A. I don't know.  
 10 Q. And what was the support staff at the time  
 11 that you were there approximately?  
 12 A. In quantity or quality?  
 13 Q. Quantity, the number of people.  
 14 A. I don't know. A lot of people.  
 15 Q. Did you do any hourly billing yourself at  
 16 all or were you strictly a contingency fee person?  
 17 A. 90 percent contingency.  
 18 Q. And with regard to the monies that were --  
 19 separate and apart from the Epstein, Epstein cases  
 20 where at least you now know that they cost between  
 21 three and \$500,000, you were, I assume, incurring  
 22 other expenses on other cases, true?  
 23 A. True.  
 24 Q. All right. And where did you, where did  
 25 you think that the money was coming from; that is,

1 BY MR. CRITTON:  
 2 Q. Where did you think the law firm -- let me  
 3 strike that. Did you ever discuss with anyone  
 4 whether it was from current cash that was being used  
 5 or whether they had a line of credit or both?  
 6 A. Didn't know.  
 7 Q. Mr. Edwards, did you come to learn that  
 8 investigators had, that investigators had gone to  
 9 Mr. Epstein's property on March 17th, 2010?  
 10 A. No.  
 11 Q. Did you ever authorize any investigators  
 12 to enter Mr. property (sic), Mr. Epstein's property  
 13 on March 17th, 2010?  
 14 MR. SCAROLA: Objection. Instruct you not  
 15 to answer on the basis of work-product  
 16 privilege.  
 17 BY MR. CRITTON:  
 18 Q. Let me just be clear. Are, are you aware  
 19 of any investigators who entered Mr. Epstein's  
 20 property on March 17th, 2010?  
 21 MR. SCAROLA: Same objection as well as  
 22 attorney-client privilege and instruct you not  
 23 to answer.  
 24 BY MR. CRITTON:  
 25 Q. Mr. Edwards, did you authorize any

1 the source of the money to pay the extensive bills  
 2 that were being incurred on Epstein and other cases?  
 3 MR. SCAROLA: I am going to object to the  
 4 extent the question calls -- excuse me, I'm  
 5 going to object because there is no proper  
 6 predicate to the question, and that is that it  
 7 was a matter that was ever given a thought by  
 8 Mr. Edwards.  
 9 MR. CRITTON: Is that form? Form is  
 10 adequate so you don't have to instruct him.  
 11 MR. SCAROLA: Thank you.  
 12 THE WITNESS: What's the question?  
 13 BY MR. CRITTON:  
 14 Q. What did you consider, what did you  
 15 believe was the cost; that is, the source of the  
 16 money that was used to be paying these extensive  
 17 costs that were being incurred in Epstein and other  
 18 cases?  
 19 MR. SCAROLA: Objection.  
 20 MR. CRITTON: Just of yours and yours  
 21 alone?  
 22 MR. SCAROLA: Objection, form and  
 23 compound.  
 24 THE WITNESS: The law firm.  
 25

1 investigators to trespass on Mr. Epstein's property  
 2 on March 17th of 2010?  
 3 MR. SCAROLA: Same objection and  
 4 instruction.  
 5 BY MR. CRITTON:  
 6 Q. Mr. Edwards, did you authorize  
 7 investigators to hide in the bushes at Mr. Epstein's  
 8 house in order to take photographs of either  
 9 Mr. Epstein or any associated objects on his  
 10 property?  
 11 MR. SCAROLA: Same objection and  
 12 instruction.  
 13 BY MR. CRITTON:  
 14 Q. Mr. Epstein -- Mr. Epstein. Mr. Edwards,  
 15 do you know a lady name Christina Kitterman?  
 16 A. Yes.  
 17 Q. Okay. And who -- how do you know her?  
 18 A. She was a lawyer at Rothstein Rosenfeldt Adler  
 19 when I was a lawyer at Rothstein Rosenfeldt Adler.  
 20 Q. Did you have any dealings with her on any  
 21 of your cases?  
 22 A. None.  
 23 Q. What did you understand her area of  
 24 practice?  
 25 A. Never knew.

1 Q. Did you know an individual by the name of  
2 Patrick Roberts?

3 A. Yes.

4 Q. Okay. And who is Mr. Roberts during; that  
5 is, what did Mr. Roberts do for RRA?

6 A. He was an investigator.

7 Q. Did he ever perform investigation work on  
8 any of the Epstein files?

9 MR. SCAROLA: Same objection, same  
10 instruction.

11 BY MR. CRITTON:

12 Q. Did you ever authorize Mr. Roberts to  
13 perform investigation on the Epstein files?

14 MR. SCAROLA: Same objection and  
15 instruction.

16 BY MR. CRITTON:

17 Q. All right. I asked you earlier about  
18 Richard Fandrey, F-a-n-d-r-e-y. I think you said  
19 you don't know who that -- you knew someone named  
20 Rick; is that correct?

21 A. I know an investigator named Rick.

22 Q. Did Rick, did Rick perform any  
23 investigation on the Epstein, did you authorize Rick  
24 to perform any investigation on the Epstein files?

25 MR. SCAROLA: Same objection and

1 instruction.

2 MR. CRITTON: Says he doesn't know them.  
3 How can that be an instruction?

4 MR. SCAROLA: Well, because I am not going  
5 to tell you, we're not going to permit  
6 Mr. Edwards to answer any questions about  
7 either what he did or what he didn't do that  
8 are part of the work product involved in his  
9 representation of the Plaintiffs with claims  
10 against Mr. Epstein whom Mr. Edwards is  
11 representing.

12 MR. CRITTON: Did you ever --

13 MR. SCAROLA: So, in light of that and  
14 what I have attempted to make very clear with  
15 regard to the scope of our objections, if you  
16 continue to ask questions which it is clear  
17 fall within the scope of my instructions to  
18 Mr. Edwards and my announced intention with  
19 regard to the scope of those instructions, then  
20 we will terminate this deposition so that I can  
21 seek a protective order.

22 My suggestion is that you move onto other  
23 areas that are outside the scope of that  
24 instruction, if you have any other questions  
25 outside the scope.

1 instruction.

2 BY MR. CRITTON:

3 Q. And I believe we talked a little bit  
4 about, we certainly talked about Mr. Jenne, did you  
5 ever authorize or direct Mr. Jenne to perform any  
6 investigation on the Epstein files?

7 MR. SCAROLA: Same objection and  
8 instruction.

9 BY MR. CRITTON:

10 Q. Are you familiar with the company called  
11 Blue Line Research and Development?

12 A. No.

13 Q. Are you, are you aware at the current time  
14 that there is an entity called Blue Line Research  
15 and Development which is composed of Mr. Roberts,  
16 Mr. Richard Fandrey, Mr. Michael Fisten and Ken  
17 Jenne?

18 A. No.

19 Q. If you're unaware of the existence of the  
20 entity called Blue Line Research and Development,  
21 LLC, would it be a correct statement that you have  
22 never authorized anyone from Blue Line Research and  
23 Development, LLC, to conduct any investigation of  
24 Jeffrey Epstein?

25 MR. SCAROLA: Same objection, same

1 MR. CRITTON: Oh, I have a lot of other  
2 questions.

3 MR. SCAROLA: Okay.

4 MR. CRITTON: Let me be clear with you  
5 with regard to any, for purposes of following,  
6 asking any follow-up questions should the court  
7 determine that I am entitled to this  
8 information, you would agree that should the  
9 court determine I am entitled to ask the name  
10 of these individuals and possibly other  
11 questions is, is that by not asking questions I  
12 am in no way waiving my right to ask as many  
13 questions as the court ultimately determines as  
14 appropriate, proper, and as the court allows,  
15 correct?

16 MR. SCAROLA: I absolutely agree.

17 MR. CRITTON: All right.

18 BY MR. CRITTON:

19 Q. Mr. Edwards, are you familiar with a  
20 person named Alfredo Rodriguez?

21 A. Yes.

22 Q. And how do you know Mr. Rodriguez?

23 A. Who do I know him to be? How do I know him?  
24 I met him the same -- well, I met him after you did,  
25 after you and your investigators pre-deposed him on three

1 various occasions for a total of about 15 hours before  
 2 we took this deposition. I met him for the first time  
 3 during that deposition.  
 4 MR. CRITTON: Let me move to strike as  
 5 nonresponsive.  
 6 BY MR. CRITTON:  
 7 Q. My question to you is when did you first  
 8 meet Mr. Rodriguez?  
 9 MR. SCAROLA: And you have an answer to  
 10 that question.  
 11 THE WITNESS: It's a very complete answer.  
 12 I, the day of his deposition.  
 13 BY MR. CRITTON:  
 14 Q. Had you ever spoken with Mr. Rodriguez  
 15 before that time?  
 16 A. No.  
 17 Q. Okay. Had anyone on your behalf spoken  
 18 with Mr. Rodriguez?  
 19 A. No.  
 20 Q. Mr. Rodriguez's deposition occurred over a  
 21 two-day period; is that correct? Two separate days.  
 22 A. I believe that's right.  
 23 Q. And you were present for both of those  
 24 depositions; is that correct?  
 25 A. Yes.

1 July 29th and August 7th?  
 2 A. And if I did or if I didn't, either [redacted] that's  
 3 going to be protected by the work-product privilege and  
 4 I'm not going to give you that information because  
 5 you're not entitled to it.  
 6 Q. I disagree even in a simple  
 7 attorney-client privilege you also, you identify the  
 8 date, you don't identify the subject, but you  
 9 identify the date, who may have been present.  
 10 MR. SCAROLA: We understand your position  
 11 and it's not necessary to articulate it on the  
 12 record.  
 13 MR. CRITTON: I just want to be clear.  
 14 And your position is the same is you're not  
 15 talking.  
 16 MR. SCAROLA: Work-product.  
 17 MR. CRITTON: Work-product, correct?  
 18 MR. SCAROLA: That's correct.  
 19 BY MR. CRITTON:  
 20 Q. Mr. Rodriguez was requested to bring  
 21 documents to his second deposition that he had  
 22 referenced that he might have. Do you recall that  
 23 from the first deposition, Mr. Edwards?  
 24 A. I do.  
 25 Q. And in fact when he came to the second

1 Q. And the first one I believe at least in  
 2 looking at the transcript the first one occurred on  
 3 January 29th of '09?  
 4 A. I'm assuming.  
 5 Q. And the second, the follow-up was on  
 6 August 7th, 2009, correct?  
 7 A. When was the first, January you said?  
 8 Q. Excuse me. I'm sorry. July 29th, 2009.  
 9 A. Okay.  
 10 Q. With the follow-up July, I'm sorry  
 11 August 7th, 2009.  
 12 A. If you say so. I'm not quarreling with that.  
 13 Q. And I will just represent that is what I  
 14 read off the transcripts. Between those two dates,  
 15 that is July 29th and August 7th of '09, did you  
 16 speak with Mr. Rodriguez at all?  
 17 MR. SCAROLA: Same objection, same  
 18 instruction to the extent that any such  
 19 conversation may have occurred in connection  
 20 with your representation of the Plaintiffs and  
 21 claims against Mr. Epstein.  
 22 BY MR. CRITTON:  
 23 Q. All I am asking right now, not the  
 24 substance but just so the record is clear I am just  
 25 asking, did you speak with Mr. Rodriguez between

1 deposition, he didn't bring any documents with him,  
 2 did he?  
 3 A. I don't remember.  
 4 Q. Well, do you remember him producing any  
 5 documents at the second, at his completion of his  
 6 deposition?  
 7 A. I don't remember.  
 8 Q. Do you recall him saying that he might  
 9 have some sort of book or some sort of list of names  
 10 and addresses and/or names, excuse me, of females  
 11 who may have come to Mr. Epstein's house along with  
 12 phone numbers?  
 13 A. I don't remember if he said that or it says  
 14 that in the police report, but I remember that  
 15 information at some point in time.  
 16 Q. All right. And subsequent, at the  
 17 conclusion -- well, let me strike that.  
 18 Do you recall receiving any documents from  
 19 Mr. Rodriguez that were produced at his deposition  
 20 that had the names and addresses and/or phone  
 21 numbers of any other females?  
 22 A. I don't know. Do you? We were there together  
 23 I don't remember specifically. I think the answer is  
 24 no.  
 25 Q. And I think you're right.

1 A. Okay.  
 2 Q. We agree on that.  
 3 A. Okay.  
 4 Q. Subsequent to the deposition; that is,  
 5 after Mr. Rodriguez's deposition, did Mr. Rodriguez  
 6 contact you?  
 7 MR. SCAROLA: Objection, instruct you not  
 8 to answer.  
 9 MR. CRITTON: Well, this is -- okay. This  
 10 is a third party contacting Mr. Edwards. All  
 11 right.  
 12 MR. SCAROLA: It is not --  
 13 MR. CRITTON: It's just a yes or no I'm  
 14 looking for.  
 15 MR. SCAROLA: It is a witness in these  
 16 proceedings.  
 17 MR. CRITTON: So.  
 18 MR. SCAROLA: So, anything that  
 19 Mr. Edwards has done or may have done in  
 20 connection with his investigation and  
 21 prosecution of the claims against Mr. Rothstein  
 22 it is our position is not the appropriate  
 23 subject matter of inquiry in the context of  
 24 this lawsuit, and is an attempt to invade the  
 25 attorney-client and work-product privileges. I

1 instruction.  
 2 BY MR. CRITTON:  
 3 Q. Did Mr. Mr. Rodriguez ever make a request  
 4 of you at any time for any type of monies for  
 5 testimony, documents, or any other information  
 6 associated with any existing or potential claimants  
 7 directed to Mr. Epstein?  
 8 MR. SCAROLA: Same objection and  
 9 instruction.  
 10 BY MR. CRITTON:  
 11 Q. Subsequent, after Mr. Rodriguez or from  
 12 the time that Mr. Rodriguez completed his deposition  
 13 on August 7th of 2009, did you have an occasion to  
 14 speak with either the FBI, well, with the FBI  
 15 regarding Alfredo Rodriguez?  
 16 MR. SCAROLA: Same objection and  
 17 instruction.  
 18 BY MR. CRITTON:  
 19 Q. Did you after Mr. Rodriguez's completion  
 20 of his deposition on August 7th, 2009, did you have  
 21 an occasion to speak with any representative, a  
 22 professional attorney, professional slash attorney  
 23 for the U.S. Attorney's Office?  
 24 MR. SCAROLA: Same objection and  
 25 instruction.

1 am instructing him not to answer.  
 2 If the court, if the court determines that  
 3 the scope of the privilege permits a response  
 4 to these questions, we would be happy to  
 5 respond to them.  
 6 But we have an obligation to, to  
 7 Mr. Edward's clients to protect their rights to  
 8 a fair trial and their rights to  
 9 confidentiality, and for that reason we are  
 10 obliged to interpret those privileges in their  
 11 broadest sense unless and until the court  
 12 decides that a more restrictive interpretation  
 13 should be applied.  
 14 BY MR. CRITTON:  
 15 Q. Between the first and second deposition of  
 16 Mr. Rodriguez, I think you, I think you indicated  
 17 that you did not speak with him; is that correct?  
 18 A. You're asking me if I indicated to you  
 19 previously during this deposition whether --  
 20 Q. Right.  
 21 A. -- I spoke to him or not? I, I don't  
 22 remember.  
 23 Q. Did you speak with Mr. Rodriguez between  
 24 his first and second.  
 25 MR. SCAROLA: Same objection, same

1 BY MR. CRITTON:  
 2 Q. Mr. Edwards, are you familiar with the,  
 3 the criminal complaint that was filed relating to  
 4 Alfredo Rodriguez?  
 5 MR. CRITTON: Let me show you what I will  
 6 mark as Exhibit 1 to the deposition.  
 7 (Plaintiff's Exhibit No. 1 was marked for  
 8 identification.)  
 9 MR. SCAROLA: By that question, does that  
 10 mean has he seen it before?  
 11 MR. CRITTON: First, let me show you  
 12 Exhibit 1. Do you -- it's a criminal  
 13 complaint, the United States of America versus  
 14 Alfredo Rodriguez.  
 15 MR. SCAROLA: Is your question has he seen  
 16 it before?  
 17 MR. CRITTON: Yes.  
 18 MR. SCAROLA: I'm not sure what "are you  
 19 familiar with it" means.  
 20 BY MR. CRITTON:  
 21 Q. Have you seen this criminal complaint  
 22 before today?  
 23 A. Yes.  
 24 Q. When did you first see this document?  
 25 A. I -- I don't know.

1 Q. Did you, did you see Exhibit 1, the  
 2 criminal complaint, prior to the time that it was  
 3 filed in the United States District Court?  
 4 A. Did I see it prior to it being filed?  
 5 Q. Yes, sir.  
 6 A. No, no.  
 7 Q. Okay. Did you provide an affidavit to any  
 8 individual at the FBI or the U.S. Attorney's Office  
 9 in support of, although not attached to this, to  
 10 Exhibit 1, the criminal complaint?  
 11 A. Repeat.  
 12 Q. Did you sign any affidavit or give, give  
 13 any sworn testimony associated with the criminal  
 14 complaint that was filed by the United States of  
 15 America versus Mr. Rodriguez?  
 16 A. It's obvious to me that you're trying to  
 17 circumvent the privileges that have been placed on the  
 18 record. I will answer that question that, no, I did  
 19 not, but I am not here to divulge anything that may  
 20 waive my attorney-client or work-product privilege or  
 21 otherwise jeopardize the claims that my three clients  
 22 are pursuing against Jeffrey Epstein for their being  
 23 sexually molested by him when they were underage minor  
 24 females.  
 25 Q. Mr. Edwards, are you the cooperating

1 during your years that you had worked as a State  
 2 Attorney?  
 3 A. No.  
 4 Q. Okay. Did you meet her only as a result  
 5 of Epstein related matters?  
 6 A. Yes, in its broadest sense I suppose.  
 7 Q. Did you, did you have, before you began  
 8 representing [REDACTED] did you know who [REDACTED]  
 9 was?  
 10 A. I don't know.  
 11 Q. What, what was your first association or  
 12 what contact was, what was your first contact with  
 13 [REDACTED] ever?  
 14 A. I don't remember.  
 15 Q. But if I understand correctly you only  
 16 know her through the context of the Jeffrey Epstein  
 17 matter; is that correct?  
 18 A. Her involvement with, yes.  
 19 Q. And that you only knew of her involvement  
 20 in the Jeffrey Epstein matter after you began  
 21 representing [REDACTED]?  
 22 A. I don't believe that to be accurate.  
 23 Q. What involvement could you possibly, what  
 24 involvement would you have had with Mrs. [REDACTED]  
 25 before you became involved in representing someone

1 witness who was referenced in the criminal  
 2 complaint, Exhibit 1?  
 3 MR. SCAROLA: Could you explain to us for  
 4 the record, please, how that line of inquiry is  
 5 reasonably calculated to lead to admissible  
 6 evidence in this case?  
 7 MR. CRITTON: I am not prepared to do that  
 8 right now.  
 9 MR. SCAROLA: Then I am not prepared to  
 10 allow Mr. Edwards to answer that question  
 11 outside the presence of an Assistant United  
 12 States Attorney who can make a judgment as to  
 13 whether that is information that ought to be  
 14 disclosed.  
 15 BY MR. CRITTON:  
 16 Q. Mr. Edwards, you knew or you first [REDACTED]  
 17 [REDACTED] through the complaint you filed on behalf  
 18 of Jane Doe 1 and Jane Doe 2 in July of 2008,  
 19 correct?  
 20 A. No.  
 21 Q. Had you spoken with her before that period  
 22 of time; that is, before the complaint was ever  
 23 filed?  
 24 A. Yes.  
 25 Q. And I am now -- did you know Ms. [REDACTED]

1 associated with the Epstein matter?  
 2 A. I believe that I had read her name in the  
 3 newspaper related to some involvement with Jeffrey  
 4 Epstein's criminal investigation and/or case. I think  
 5 that's the first time I saw her name, I believe.  
 6 Q. Before, before you filed a lawsuit against  
 7 the United States of America, and I may have asked  
 8 you this earlier, so I apologize, did you ever speak  
 9 with Mrs. [REDACTED]?  
 10 A. I believe that any communications that I would  
 11 have had with respect to Mrs. [REDACTED] would have only  
 12 been in the interest of pursuing claims on behalf of the  
 13 clients that I represented. And therefore I am going to  
 14 claim a work-product privilege as to those  
 15 communications.  
 16 Q. Okay. My, my question was is only did you  
 17 speak with her prior to filing that complaint? Just  
 18 a yes or a no, and I am looking, that question is  
 19 not asking for the substance. I am just asking for  
 20 a yes or no.  
 21 MR. SCAROLA: Same objection, same  
 22 instruction.  
 23 BY MR. CRITTON:  
 24 Q. During the course of the litigation with  
 25 the United States Attorney's Office, I assume you

1 had conversations with Mrs. [REDACTED] from time to  
 2 time?  
 3 A. Okay.  
 4 Q. Is that true?  
 5 A. Is your assumption true?  
 6 Q. Correct.  
 7 A. I have spoken with Ms. [REDACTED].  
 8 Q. And when you spoke with Ms. [REDACTED] --  
 9 let me strike that. Have the only conversations  
 10 that you have had with Mr. [REDACTED] or  
 11 [REDACTED], have they only been in the context of  
 12 Jane Doe 1 and 2 versus United States of America,  
 13 only in the context of that case?  
 14 MR. SCAROLA: Same objection.  
 15 MR. CRITTON: And I will separate out to  
 16 the extent that you were at the June 12th,  
 17 2009, hearing in front of Judge Marra where she  
 18 was present.  
 19 MR. SCAROLA: Same objection, same  
 20 instruction.  
 21 BY MR. CRITTON:  
 22 Q. Has Ms. -- have you spoken, have you had an  
 23 occasion to speak with Ms. [REDACTED] with regard to  
 24 the criminal complaint, Exhibit No. 1, involving  
 25 Alfredo Rodriguez, Mr. Rodriguez?

1 BY MR. CRITTON:  
 2 Q. Did you speak with Agent [REDACTED] at that  
 3 time?  
 4 A. Yes.  
 5 Q. Okay. And what did, what did, did she  
 6 initiate the conversation or did you?  
 7 A. The court initiated the conversation.  
 8 Q. Did the court say go outside and talk?  
 9 A. Right.  
 10 Q. The court being Judge Marra?  
 11 A. Correct.  
 12 Q. And who else was present for that  
 13 conversation?  
 14 A. I don't remember. [REDACTED] [REDACTED].  
 15 Q. Okay. What was the discussion about that  
 16 the court ordered?  
 17 A. The failure of the U.S. Attorney's Office to  
 18 meaningfully confer with the numerous victims of Jeffrey  
 19 Epstein's sexual abuse prior to negotiating a plea in  
 20 his criminal matter.  
 21 Q. How long did the conversation last?  
 22 A. Less than ten minutes.  
 23 Q. Was Agent [REDACTED] there as well?  
 24 A. There was a male agent there. I don't know  
 25 his name, but there was another FBI agent.

1 MR. SCAROLA: Same objection, same  
 2 instruction.  
 3 BY MR. CRITTON:  
 4 Q. Mr. Edwards, have you ever been  
 5 interviewed by the FBI or the U.S. Attorney's office  
 6 with regard to any of your clients?  
 7 MR. SCAROLA: Any of the three clients who  
 8 have claims against Mr. Epstein?  
 9 MR. CRITTON: Correct.  
 10 MR. SCAROLA: Same objection, same  
 11 instruction.  
 12 BY MR. CRITTON:  
 13 Q. Do you know [REDACTED] sir?  
 14 A. Yes.  
 15 Q. And how do you know Agent [REDACTED] from the  
 16 FBI?  
 17 A. I can answer if you want.  
 18 MR. SCAROLA: Okay. That's fine.  
 19 MR. CRITTON: [REDACTED] [REDACTED].  
 20 THE WITNESS: I don't know her last name  
 21 but I do know the first name is, the first name  
 22 is obviously an unusual name, so I do know who  
 23 that is. I met her outside of the courtroom  
 24 related to the Jane Doe 1 and 2 versus United  
 25 States of America case.

1 Q. Did Agent [REDACTED] [REDACTED], did she say  
 2 anything? Did she participate in the conversation?  
 3 A. No.  
 4 Q. Okay. Was it just Mrs. [REDACTED]?  
 5 A. There was another U.S. Attorney there.  
 6 Q. A U.S.A.O. there?  
 7 A. Yes.  
 8 Q. Do you remember a he or a she?  
 9 A. He.  
 10 Q. Do you remember his name?  
 11 A. [REDACTED].  
 12 Q. [REDACTED]?  
 13 A. I think that's his last name. [REDACTED].  
 14 Q. Did Mr. -- did [REDACTED] [REDACTED], is he the one  
 15 who conducted the conversation with you?  
 16 A. Yes.  
 17 Q. What was his response to your statement?  
 18 A. That this conversation is more complicated  
 19 than the time constraints that we have right now will  
 20 allow. We are not going to come to a resolution at this  
 21 point on any issues that you or your clients believe are  
 22 pertinent to the case you filed.  
 23 Q. That was the end of the conversation?  
 24 A. I mean, I am not quoting verbatim, but, yes  
 25 that was the summary.

1 Q. And did you go back in front of Judge  
 2 Marra that same day?  
 3 A. I can't remember.  
 4 Q. Did he issue an order based upon that  
 5 hearing?  
 6 A. The, the record in the case will speak for  
 7 itself. I really, I don't remember right now.  
 8 Q. Have you had any other conversations with  
 9 [REDACTED] other than? Well, I mean any  
 10 other face-to-face conversations with her other than  
 11 that one day back in July of, July or August of  
 12 2008?  
 13 A. No.  
 14 Q. Have you seen [REDACTED], Agent [REDACTED]  
 15 [REDACTED] since July, July or August of 2008 during  
 16 that short conference as physically seen her  
 17 someplace?  
 18 A. Unless she was at the hearing we all attended  
 19 on your motion to stay that day when there were a lot of  
 20 people in the courtroom, the answer is no.  
 21 Q. Okay. Have you seen Agent [REDACTED], assuming  
 22 the male agent's name was [REDACTED] or [REDACTED]  
 23 have you seen him since that day in July or August  
 24 of 2008?  
 25 A. I do not believe I have.

1 Rothstein.  
 2 Q. So, it would be a correct, and I am going  
 3 to expand it, would it be a correct statement that  
 4 no representative of the federal government and by  
 5 that I mean the Department of Justice, FBI, any  
 6 other law enforcement agency nor any state  
 7 governmental agency has ever asked you or quizzed  
 8 you or questioned you about your association with  
 9 Rothstein, Rosenfeldt, and Adler during the seven,  
 10 approximately seven months you were there; is that  
 11 correct?  
 12 A. That's correct.  
 13 Q. Mr. Edwards, has, has anyone from the  
 14 United States Attorney's Office discussed the  
 15 topic -- well, let me strike that. Have you been  
 16 granted immunity with regard to any aspect of your  
 17 work associated with either the Epstein files or the  
 18 Rothstein prosecution?  
 19 A. I don't understand your question.  
 20 Q. Okay. You're aware that Mr. --  
 21 A. I can answer, no. I haven't been granted  
 22 immunity to anything, so it doesn't matter what your  
 23 question is.  
 24 Q. Okay. Have you ever had any conversations  
 25 with any of the probation officers in Palm Beach

1 Q. Have you spoken with either [REDACTED]  
 2 [REDACTED] or [REDACTED] relating to any Epstein  
 3 related matter since July or August of 2008?  
 4 MR. SCAROLA: I am going to instruct you  
 5 not to answer on the basis of the privilege as  
 6 previously described.  
 7 BY MR. CRITTON:  
 8 Q. Mr. Edwards, have you spoken with any rep,  
 9 has any representative of the FBI attempted to speak  
 10 with you regarding your association with the RRA  
 11 firm?  
 12 A. No.  
 13 Q. Has any member of the U.S. Attorney's  
 14 Office discussed with you any aspect of your tenure  
 15 or employment at the RRA firm?  
 16 A. No.  
 17 Q. In any conversations that you, that you  
 18 had that you've had with the United States  
 19 Attorney's Office at any time, has anyone ever asked  
 20 you any questions about Scott Rothstein?  
 21 A. You're presupposing that I had conversations,  
 22 but I will answer the question whether I have or have  
 23 not had conversations. Nobody has asked me any  
 24 questions from the State Attorney's Office, U.S.  
 25 Attorney Office, FBI, or other agency related to Scott

1 County regarding Mr. Epstein?  
 2 A. No.  
 3 Q. Have you directed that anyone have any  
 4 discussions with the probation officers in Palm  
 5 Beach County regarding Mr. Epstein?  
 6 A. That is clearly calling for work-product  
 7 privilege information. I'm not going to answer the  
 8 question.  
 9 Q. Have you had any discussion with any of  
 10 the other lawyers who represent clients in the  
 11 Epstein, in Epstein related matters regarding  
 12 Mr. Epstein's probation?  
 13 MR. SCAROLA: Same objection, same  
 14 instructions, and I would add to those  
 15 objections the objection based upon a joint  
 16 prosecution interest.  
 17 BY MR. CRITTON:  
 18 Q. Mr. Edwards, among the Plaintiffs'  
 19 lawyers, is there any type of joint prosecution  
 20 agreement related to Mr. Epstein?  
 21 MR. SCAROLA: Same objection, same  
 22 instruction.  
 23 BY MR. CRITTON:  
 24 Q. Did you have -- did you engage in weekly  
 25 or monthly meetings among the Plaintiffs' lawyer to

1 share investigative material regarding, that you had  
 2 obtained regarding Mr. Epstein?  
 3 MR. SCAROLA: Same objections and  
 4 instructions.  
 5 BY MR. CRITTON:  
 6 Q. Did you provide any of the investigative  
 7 materials that had been acquired by you to any other  
 8 person outside of the RRA firm and the Farmer, Jaffe  
 9 firm up through the current date?  
 10 MR. SCAROLA: Would you read that question  
 11 back?  
 12 BY MR. CRITTON:  
 13 Q. Let me ask it. During the time that you  
 14 were with RRA, excuse me, and had investigation done  
 15 on Mr. Epstein, was any of your investigation that  
 16 you had performed turned over to any person outside  
 17 of RRA or your clients?  
 18 MR. SCAROLA: Same objection, same  
 19 instruction to the extent that that would  
 20 encompass other attorneys with a shared  
 21 interest in the prosecution of Mr. Epstein.  
 22 If any of those materials were turned over  
 23 to persons who did not have a direct interest  
 24 to lawyers who did not have a direct interest  
 25 in the prosecution of the claims against

1 instruction.  
 2 BY MR. CRITTON:  
 3 Q. Mr. Edwards, do any of the  
 4 investigators -- let me strike that. Did any of the  
 5 investigators who worked for RRA refer any Epstein  
 6 client to you?  
 7 A. What is an Epstein client?  
 8 Q. I am sorry. Did any of the investigators  
 9 who worked for RRA refer a perspective claimant  
 10 against Mr. Epstein to you?  
 11 A. No.  
 12 Q. Did any of your, did any of the RRA  
 13 investigators ever meet with your three clients?  
 14 MR. SCAROLA: Same objection. Same  
 15 instruction.  
 16 MR. CRITTON: Okay. And I'm looking for  
 17 is a yes/no.  
 18 MR. SCAROLA: Correct. Same objection,  
 19 same instruction.  
 20 BY MR. CRITTON:  
 21 Q. Mr. Edwards, during the time that you were  
 22 with RRA, did you, your e-mail, was your only e-mail  
 23 address bedward [REDACTED]  
 24 A. I only had one e-mail address.  
 25 Q. All right. Did you ever receive any

1 Mr. Epstein or to clients who did not have, to  
 2 persons who did not have a direct interest in  
 3 the pursuit of their claims against  
 4 Mr. Epstein, then you can answer to that  
 5 extent.  
 6 THE WITNESS: Privileged.  
 7 BY MR. CRITTON:  
 8 Q. And I just want to be clear is, is there  
 9 any written agreement and I know you, I want to make  
 10 certain that the objection is there, is as we both  
 11 know there are a number of claims. There are a  
 12 number of claims that are outstanding against  
 13 Mr. Epstein brought by a number of different  
 14 lawyers.  
 15 MR. SCAROLA: The objection extends to  
 16 both written agreements and oral agreements.  
 17 THE WITNESS: Yes. We both know that  
 18 there are a lot of claims against Mr. Epstein  
 19 for basically the same conduct.  
 20 BY MR. CRITTON:  
 21 Q. And my question to you is is, is there any  
 22 written agreement between the Plaintiff lawyers who  
 23 have filed claims against Mr. Epstein regarding the  
 24 sharing of information?  
 25 MR. SCAROLA: Same objection, same

1 information regarding your cases at your home  
 2 e-mail?  
 3 A. I don't remember.  
 4 Q. Okay. What is your home e-mail address,  
 5 please.  
 6 THE WITNESS: Do I give this?  
 7 MR. SCAROLA: (Mr. Scarola nods his head.)  
 8 THE WITNESS: [REDACTED]  
 9 BY MR. CRITTON:  
 10 Q. Did you have a separate fax number at RRA  
 11 when you were there; that is, just so a fax would  
 12 come directly to either yours or an area where you  
 13 were located?  
 14 A. No.  
 15 Q. In any of the directions that you ever  
 16 gave to the investigators, did you ever put that in  
 17 the form of a memo; that is, would you give them  
 18 written directions?  
 19 MR. SCAROLA: Same objection, same  
 20 instruction.  
 21 BY MR. CRITTON:  
 22 Q. To your knowledge did any of the  
 23 investigations that were done regarding Mr. Epstein,  
 24 were they provided to any other person at RRA?  
 25 A. Excuse me?

1 Q. You have testified that investigations  
2 were done during the time, on Mr., relating to  
3 Mr. Epstein during the time that you were at RRA

4 A. Right.

5 Q. My question to you is, did you -- first of  
6 all did you receive written reports in addition to  
7 oral reports?

8 A. From the investigators?

9 Q. Yes, sir.

10 THE WITNESS: Answer?

11 MR. SCAROLA: Yeah.

12 THE WITNESS: The reports were -- yes, I  
13 did.

14 BY MR. CRITTON:

15 Q. And were the reports provided by e-mail or  
16 were they provided by, in the form of a memo that  
17 would be sent from the investigator to you or both?

18 A. I, I do not remember there being any in the  
19 form of an e-mail. Does not mean that there was not. I  
20 did communicate by e-mail with other members of the firm  
21 and other members of the investigative team on all cases  
22 as has been my practice all along practicing law. There  
23 were memos, though, that were given to me that were not  
24 e-mail form that were the standard memos that I would  
25 incorporate into a witness memo file.

1 and I'm using just as an example, is that he came in  
2 or Scott Rothstein came in and looked at a  
3 particular file of yours, whether it related to  
4 Mr. Epstein or not, you don't know?

5 A. I can't answer that question accurately.

6 Q. Okay. Did you ever send investigative  
7 reports to other lawyers regarding Mr. Epstein; that  
8 is, if you got an investigative report from  
9 Mr. Fisten or Mr. Jenne or whomever, would you send  
10 those on to certain lawyers on a regular basis?

11 MR. SCAROLA: You can answer that  
12 question.

13 THE WITNESS: No.

14 BY MR. CRITTON:

15 Q. What lawyers, other than yourself, were  
16 involved in the Epstein cases during the time you  
17 were associated with RRA?

18 A. What do you mean by "were involved?" I guess  
19 all.

20 Q. What, what lawyers actually worked on the  
21 file? I know Mr. Berger worked on the Epstein  
22 cases, correct?

23 A. In some limited capacity, correct.

24 Q. Okay. Mr. Adler I know attended  
25 Mr. Epstein's deposition, correct?

1 Q. And again that would just be in your,  
2 would that be in your electronic storage as well as  
3 in the hard copies?

4 A. The version I saw was the electronic.

5 Q. So, that would be stored in the Fortis  
6 program?

7 A. That's correct.

8 Q. All right. And again other individuals in  
9 the firm, other lawyers in the firm might be able to  
10 access that program, you just don't know?

11 A. Right. Well, the program, obviously that's  
12 the program that the firm used. Now, whether they could  
13 access, if you could go across cases that weren't cases  
14 you worked on, I really just don't know.

15 Q. As an example could Mr. Fisten, on the, on  
16 the Fortis, could he access your, your file on an  
17 Epstein case?

18 A. I don't know.

19 Q. If someone accessed your file, accessed  
20 your electronic file, would you necessarily know  
21 that?

22 A. No.

23 Q. All right. So --

24 A. I don't believe so.

25 Q. It wouldn't show up that Michael Fisten,

1 A. Correct.

2 Q. Did, did any other lawyers other than  
3 Mr. Adler or Mr. Berger attend any depositions?

4 A. Your memory is going to be as good as mine  
5 there. I'm thinking. Mark Epstein's deposition was  
6 attend by Russell Adler.

7 Q. He went with you to New York?

8 A. No. He didn't go with me to New York. He  
9 attended the deposition, and I also attended the  
10 deposition.

11 Q. Both in person?

12 A. Right.

13 Q. Was he there for another file or did he  
14 meet you there to specifically attend Mark Epstein's  
15 deposition?

16 A. Coincidence that he was in New York during the  
17 time when his deposition was being taken.

18 Q. Any other lawyer that you can recall being  
19 at a deposition other than Adler, Berger and  
20 yourself?

21 A. Not right now. If you remind me, I, I may  
22 remember. I don't remember right now.

23 Q. Did other lawyers in the firm at RRA  
24 perform services on the files; that is, and by that  
25 I mean did they, were they involved in drafting

1 motions, research, appeals, pleadings, papers that  
 2 were filed?  
 3 MR. SCAROLA: You can, you can answer  
 4 whether they were, there were other lawyers  
 5 involved in drafting tasks without identifying  
 6 what those may have been.  
 7 THE WITNESS: Other lawyers contributed to  
 8 some extent to the prosecution of those cases.  
 9 BY MR. CRITTON:  
 10 Q. Who? Names. I'm not asking for tasks.  
 11 MR. SCAROLA: You can answer.  
 12 MR. CRITTON: I am asking for names.  
 13 THE WITNESS: Bill Berger, Judge Stone,  
 14 Russell Adler, Rob Buschel.  
 15 BY MR. CRITTON:  
 16 Q. B-o-u-c-h-  
 17 A. I don't know how to spell it. B-u, I don't  
 18 know how, B-u-s-c-h-, I believe.  
 19 Q. All right. Is he currently with you now?  
 20 A. No.  
 21 Q. Any other lawyers?  
 22 A. And you're asking for no matter how minimal,  
 23 just anything done by any lawyers?  
 24 Q. Correct.  
 25 A. Michael, I think his name is Michael. It was

1 Epstein case?  
 2 A. When I was giving you that list of names, I  
 3 was picturing one of the couple meetings related to  
 4 Jeffrey Epstein's case. Could there have been other  
 5 lawyers in the room, yes, but I think that is the  
 6 exclusive list.  
 7 Q. Did Mr., did anyone ever attend by phone  
 8 meetings associated --  
 9 A. I understand.  
 10 Q. -- that involved Mr. Epstein?  
 11 A. I understand. No.  
 12 Q. Did Scott Rothstein ever attend any  
 13 meetings wherein strategy was discussed regarding  
 14 the Epstein cases?  
 15 A. No.  
 16 Q. The one meeting that you had in Mr.,  
 17 Mr. Rothstein's office with Russell Adler and some  
 18 unknown person on the phone, were you given any  
 19 direction at that time that certain discovery should  
 20 be done or certain tactics should be used with  
 21 regard to prosecuting the Epstein cases?  
 22 MR. SCAROLA: Same objection, same  
 23 instructions.  
 24 BY MR. CRITTON:  
 25 Q. Did you ever receive any -mail

1 another lawyer. That's, that's -- those are the ones  
 2 that I can remember right now.  
 3 Q. Were there ever meetings that occurred,  
 4 well, not -- were there ever specific meetings that  
 5 were attended by various lawyers to discuss  
 6 Epstein's cases?  
 7 MR. SCAROLA: You can answer whether there  
 8 were meetings.  
 9 THE WITNESS: There were meetings to  
 10 discuss every case including Jeffrey Epstein's  
 11 cases.  
 12 BY MR. CRITTON:  
 13 Q. And when you say there were meetings to  
 14 discuss every case, were there routine meetings that  
 15 were held to discuss your cases or cases in general?  
 16 A. It's how the firm worked. If you wanted to  
 17 discuss cases, or the case was a case that was thought  
 18 to need more than one or more than two attorneys, then a  
 19 meeting could easily be assembled within RRA to sit  
 20 around the table and discuss issues related to any case.  
 21 And yes, that happened with respect to cases filed  
 22 against Jeffrey Epstein.  
 23 Q. And so there could have been additional  
 24 lawyers in addition to Adler, Stone, Berger, and Rob  
 25 Buschel and yourself that would have commented on an

1 correspondence from Scott Rothstein that detailed or  
 2 that set forth discovery that would be, that should  
 3 be undertaken with regard to the Epstein cases?  
 4 MR. SCAROLA: You can answer that with a  
 5 yes or no.  
 6 THE WITNESS: No.  
 7 BY MR. CRITTON:  
 8 Q. Did you ever have, did you ever receive  
 9 any correspondence directly, Mr., Mr. Rothstein to  
 10 you, during the time that you were at RRA?  
 11 A. Yes.  
 12 Q. Did any of the correspondence ever involve  
 13 Epstein or communication ever involve Epstein?  
 14 MR. SCAROLA: You can answer that.  
 15 THE WITNESS: To some extent, yes.  
 16 BY MR. CRITTON:  
 17 Q. Okay. And what did, what did, what  
 18 information did Mr. Rothstein send you that involved  
 19 Mr. Epstein?  
 20 MR. SCAROLA: Same objection, same  
 21 instruction.  
 22 BY MR. CRITTON:  
 23 Q. Is the information that you received or  
 24 the communication you received from Mr. Rothstein  
 25 regarding, that involved Mr. Epstein, was that by

1 way of e-mail?  
 2 A. Yes.  
 3 Q. Did you ever receive any memorandum from  
 4 him; that is, a typewritten memo that was then sent  
 5 to you through office mail that was not electronic  
 6 involving Mr. Epstein?  
 7 A. No.  
 8 Q. At the meetings that you, at the meetings  
 9 that occurred where these various lawyers, Berger,  
 10 Adler, Stone, Rob Buschel were present and Epstein  
 11 was discussed, was the discovery that, discovery  
 12 and/or investigation regarding Mr. Epstein was that  
 13 ever discussed?  
 14 MR. SCAROLA: Same objection, same  
 15 instruction.  
 16 BY MR. CRITTON:  
 17 Q. Mr. Edwards, are you aware as a former  
 18 state prosecutor that there are laws against  
 19 conducting certain financial transactions in money  
 20 that's derived from a crime?  
 21 A. I don't understand your question.  
 22 Q. Okay. Well, you were a former state  
 23 prosecutor; is that correct?  
 24 A. Right. Yes.  
 25 Q. Right. Are you aware that there are

1 RICO claims.  
 2 Q. But you certain have brought RICO claims  
 3 against Mr. Epstein?  
 4 A. I know about one now.  
 5 Q. Okay. At the time that you were at the  
 6 State Attorney's Office, what kind of -- how long  
 7 were you there?  
 8 A. Three years.  
 9 Q. And what kind of crimes did you prosecute?  
 10 A. Beginning with DUT's through attempted murders  
 11 and everything in between. No -- well, not no, very few  
 12 economic crimes, some insurance fraud cases but very  
 13 few, otherwise drugs, guns, robberies, burglaries  
 14 attempted murder, aggravated batteries, those types of  
 15 crimes, false imprisonment.  
 16 Q. Well, were you ever, do you know what  
 17 money laundering means in a criminal context?  
 18 A. In some basic sense I do know what money  
 19 laundering means.  
 20 Q. What do you understand that to be?  
 21 A. That you, that the criminal takes money and  
 22 through some illegal means attempts to make bad money  
 23 legitimate.  
 24 MR. CRITTON: Let me show you what I will  
 25 mark as Exhibit 2 which is the complaint that

1 certain laws both state and federal that, that are,  
 2 that preclude conducting certain financial  
 3 transaction, transactions in money that is derived  
 4 from a crime?  
 5 A. Still don't understand your question. But  
 6 first before I try to answer your question, are you  
 7 taking me back to a time when I was a State Attorney and  
 8 asking back then did I know and then your question?  
 9 Q. Yes.  
 10 A. Back when I was a State Attorney did I know  
 11 that there are crimes related to money transactions?  
 12 Q. No.  
 13 MR. SCAROLA: Could I help you? Do you  
 14 want to ask him whether he was aware of the  
 15 existence of a state RICO statute?  
 16 MR. CRITTON: No.  
 17 MR. SCAROLA: Okay.  
 18 MR. CRITTON: I am okay with that first,  
 19 but I am still going to ask my question.  
 20 BY MR. CRITTON:  
 21 Q. I assume you're aware of the existence of  
 22 a state RICO statute, correct?  
 23 A. I don't know that I was aware of that back  
 24 then. I just can't remember whether I knew about RICO  
 25 back at the State Attorney's Office. I never prosecuted

1 was filed against Mr. Rothstein, yourself, and  
 2 [REDACTED].  
 3 (Plaintiff's Exhibit No. 2 was marked for  
 4 identification.)  
 5 BY MR. CRITTON:  
 6 Q. You're familiar with this complaint, sir?  
 7 A. Unfortunately I have read this frivolous  
 8 complaint.  
 9 MR. CRITTON: Move to strike as  
 10 nonresponsive. You've seen -- all I want is a  
 11 yes or no.  
 12 Are you familiar with this document?  
 13 MR. SCAROLA: I am going to object to the  
 14 form of the question. It is vague and  
 15 ambiguous. I don't know what familiarity  
 16 means. He has seen it before.  
 17 BY MR. CRITTON:  
 18 Q. Mr. Edwards, you have seen and read the  
 19 entire complaint along with the attachments,  
 20 Exhibit 2?  
 21 A. I've read the complaint. I have never read in  
 22 the entirety Exhibit 2.  
 23 Q. Are you familiar, do you know what an  
 24 information is?  
 25 A. Yes.

1 Q. And that's Exhibit 1 attached to the  
 2 complaint, correct?  
 3 A. Correct.  
 4 Q. And you're aware that, and this is the  
 5 information that was brought by the United States of  
 6 America, U.S.A. versus Scott Rothstein, correct?  
 7 A. Yes.  
 8 Q. And you're aware that within the -- well  
 9 let me strike that. Are you aware that  
 10 Mr. Rothstein has pled guilty to, excuse me, the  
 11 information that was brought against him by the  
 12 U.S.A.?  
 13 A. I am aware that he pled guilty to something.  
 14 Q. With regard to the complaint brought by  
 15 the U.S.A., I am sorry, the information brought by  
 16 U.S.A. against Mr. Rothstein, I assume you have read  
 17 the allegations associated with the racketeering  
 18 conspiracy, the pattern of racketeering activity,  
 19 correct?  
 20 A. I haven't.  
 21 Q. Okay. If you turn to Page 3, Paragraph 4,  
 22 were you aware, were you aware prior to coming in  
 23 here today that Mr. Rothstein was, that the charges  
 24 that were brought against him were for under, under  
 25 RICO but with regard to mail fraud, wire fraud,

1 asserted that the firm was a racketeering  
 2 enterprise, correct?  
 3 A. Not necessarily -- no.  
 4 Q. Well, if you look in Paragraph 2, see  
 5 where the firm is identified as the enterprise of  
 6 the racketeering conspiracy?  
 7 A. Law firm. Paragraph 2 of the information says  
 8 Rothstein Rosenfeldt Adler, P.A., was a law firm with  
 9 offices located at [REDACTED]  
 10 [REDACTED] and elsewhere. The law firm  
 11 employed approximately 70 attorneys and engaged in the  
 12 practice of law involving a wide range of specialties  
 13 including labor and employment law.  
 14 Q. Are you in Paragraph 2?  
 15 A. Of the information, yes.  
 16 Q. I'm sorry. I am looking at -- my  
 17 apologies. On Paragraph 2 under Count I, my error.  
 18 A. Okay.  
 19 Q. See where the law firm is identified as  
 20 the racketeering enterprise?  
 21 A. I'm sorry. Your question is am I, do I  
 22 recognize that the law firm is categorized as an  
 23 enterprise. Yes, in that paragraph I see that.  
 24 Q. Have you had an occasion to discuss with  
 25 any, with either Mr. Adler or Mr. Rosenfeldt any of

1 laundering of monetary instruments, engaging in  
 2 monetary transactions, and conspiracy to launder  
 3 monetary instruments and engage in monetary  
 4 transactions?  
 5 A. I, I have read that in the newspapers. I have  
 6 been told that by numerous people. So, yes, I was aware  
 7 of that.  
 8 Q. And within the complaint at Paragraph 6 it  
 9 says the Defendant --  
 10 A. The information or the complaint?  
 11 Q. I'm sorry. Within the information,  
 12 Exhibit 1 to the complaint, in Paragraph 6 where it  
 13 speaks in terms of the Defendant and his  
 14 co-conspirators, conspirators agreed, agreed to  
 15 engage in a pattern of racketeering activity through  
 16 its base of operation at the offices of RRA Do you  
 17 see that?  
 18 A. Yes.  
 19 Q. Okay. Do you know who the, do you know  
 20 any of the co-conspirators in addition who are  
 21 associated with Mr. Rothstein?  
 22 A. Assuming that they are former employees of  
 23 RRA, which I would presume several of them are, I am  
 24 sure that I probably know them.  
 25 Q. And you're aware that the government has

1 the allegations directed to Mr. Rothstein --  
 2 A. No.  
 3 Q. -- in the criminal complaint?  
 4 A. No.  
 5 Q. Since the implosion at the firm have you  
 6 had an occasion to talk about or speak or discuss  
 7 any firm business regarding Mr. Rothstein and the  
 8 ponzi scheme that he was running at RRA?  
 9 A. Have I had an occasion where I could have  
 10 talked --  
 11 Q. No, I'm sorry. Have you had an occasion  
 12 to discuss with Mr. Adler since you left the firm or  
 13 since the implosion any aspects of the, of the ponzi  
 14 scheme that Mr. Rothstein and his co-conspirators  
 15 were running through the firm?  
 16 MR. SCAROLA: Are you asking whether he  
 17 did have such a discussion or whether he had an  
 18 occasion to have such a discussion?  
 19 BY MR. CRITTON:  
 20 Q. Did you have such a discussion?  
 21 A. No.  
 22 Q. Okay. Have you discussed that or have you  
 23 seen Mr. Adler at all other than hi, hello, since --  
 24 A. Yes. So, the occasion existed. We just  
 25 didn't have that discussion.

1 Q. Have you, and if I understand correctly  
2 you haven't discussed any firm business with  
3 Mr. Adler since the implosion; is that correct?  
4 A. Firm business?  
5 Q. Any firm RRA business?  
6 A. Right, no.  
7 Q. How about with Mr. Rosenfeldt, have you  
8 had any discussions with him --  
9 A. None.  
10 Q. -- since the implosion of the firm in late  
11 October of '09?  
12 A. No.  
13 Q. If you wanted, if you had any, other than  
14 your existing partners have you had an occasion to  
15 speak with any other partners or former partners of  
16 the firm regarding the implosion -- well, let me  
17 strike that -- regarding the ponzi scheme that was  
18 being run by Mr. Rothstein through the firm?  
19 A. I have spoken to my current partners about it.  
20 Q. Are your current partners, are you aware  
21 of any of your current partners being a target of an  
22 investigation as a potential co-conspirator with  
23 Mr. Rothstein?  
24 A. No, way.  
25 Q. You're not aware of or no one has told you

1 that, correct?  
2 A. I am not aware of that and nobody has told me  
3 that.  
4 Q. Mr. Rothstein founded what was, what  
5 ultimately became RRA in approximately 2002. Were  
6 you aware of that fact?  
7 A. No.  
8 Q. How long did you think Mr. Rothstein had  
9 been -- well, let me strike that. How long did you  
10 think RRA had been in existence prior to your  
11 joining the firm? What were you told?  
12 A. I don't know what I was ever told. I think  
13 that I learned that information when the implosion, as  
14 you call it, occurred.  
15 Q. And were you, in terms of what the  
16 revenues of the firm were, were you ever advised  
17 what the revenues of the firm were?  
18 A. No.  
19 Q. Okay. Were you, were you familiar with  
20 what the expenses were associated with operating the  
21 RRA firm?  
22 A. No.  
23 Q. Were you in anyway -- well, let me strike  
24 that. With regard to -- let me take a five minute  
25 break and let me collect my thoughts.

1 THE VIDEOGRAPHER: We are now off video  
2 record --  
3 MR. SCAROLA: That will be a refreshing  
4 change.  
5 THE VIDEOGRAPHER: We are now off video  
6 record at 3:44 p.m.  
7 (A brief recess was held.)  
8 MR. CRITTON: Mr. Edwards --  
9 THE VIDEOGRAPHER: We're back on video  
10 record. It is 3:59 p.m.  
11 BY MR. CRITTON:  
12 Q. Mr. Edwards, when you joined RRA, if I  
13 understood your earlier testimony, with regard to  
14 the Epstein cases and your other cases when you came  
15 there as far as you were concerned is you had the  
16 ability to spend whatever money was necessary to  
17 prosecute the Epstein cases, fair statement?  
18 A. I don't know that that's true or it's not true  
19 I mean.  
20 Q. Well --  
21 A. My judgment was never questioned.  
22 Q. Correct. And therefore whatever monies  
23 you spent either in investigation, in doing  
24 discovery, that was your decision and your decision  
25 alone, true?

1 A. Whatever money that I spent was my decision --  
2 Q. No. Whatever money you spent on  
3 investigators, on doing depositions, on requesting  
4 transcripts, on doing what was necessary to  
5 prosecute the Epstein cases, that was your decision?  
6 A. No. The actions were my decisions in terms of  
7 how to prosecute the case. The amount of money to spend  
8 per exercise was not my decision nor was I privy to that  
9 information.  
10 Q. Well, but, you were the one who directed  
11 that the particular task be taken, correct?  
12 MR. SCAROLA: This is, this is  
13 repetitious.  
14 MR. CRITTON: I am setting a stage.  
15 MR. SCAROLA: This is repetitious of areas  
16 of examination that were covered thoroughly in  
17 the earlier portions of this deposition.  
18 THE WITNESS: If I wanted a witness  
19 interviewed, I could ask an investigator to  
20 interview. The investigator, how they were  
21 paid, how much they were paid, whether they  
22 were paid is not something that I had any  
23 knowledge of at all.  
24 BY MR. CRITTON:  
25 Q. Okay. When you ran your own firm you

1 obviously knew what, whether hiring an investigator  
 2 or what a particular cost was because you had to pay  
 3 it, correct?  
 4 A. Yes.  
 5 Q. Okay. And I think as you described  
 6 earlier is that there had been very little discovery  
 7 up until the time you started working for RRA in  
 8 your three cases, true?  
 9 A. Not very little discovery. Obviously we had  
 10 gone through interrogatories, responses, request for  
 11 production, responses or lack of responses, however, the  
 12 majority of the depositions that were taken, the cases  
 13 just happened to be right last summer for most of those  
 14 depositions to take place, and that's what happened.  
 15 Q. Not only depositions but as well the  
 16 investigation as you have described, your  
 17 investigator that you hired as an outside person  
 18 didn't really start until late March or early April  
 19 in conjunction with the other investigation that you  
 20 did during the time you were with RRA, correct?  
 21 A. Fair statement.  
 22 Q. All right. And when you were at RRA you  
 23 described earlier, and I won't belabor it, but you  
 24 described the compound I think is the word that you  
 25 used that Mr. Rothstein kept himself in when he was

1 Q. Okay. Were they all on the, were they,  
 2 were they --  
 3 A. Some were B.S.O as well. Some were Broward  
 4 Sheriff's Office. Some were from Fort Lauderdale. It  
 5 was both.  
 6 Q. With, with regard to the police officers  
 7 and the Sheriff's Deputy's that were present, where  
 8 they on every floor of RRA?  
 9 A. It seemed that way.  
 10 Q. And had you ever been in a, in a law firm  
 11 either as a visitor or as an employee or partner  
 12 where you had seen armed guards from either a  
 13 Sheriff's Office or a police department roaming the  
 14 halls?  
 15 A. No.  
 16 Q. Had you ever been to the RRA offices  
 17 before you accepted the job?  
 18 A. No.  
 19 Q. When you got there and you saw the armed  
 20 guards patrolling the floors, did you ever have a  
 21 conversation with Russell Adler or anyone else as  
 22 like what in heaven's name is going on here?  
 23 A. I didn't see them when I first got there.  
 24 Q. How much time passed before you saw the  
 25 guards?

1 at the firm, correct?  
 2 A. Correct.  
 3 Q. Right. And he was not accessible to  
 4 everyone else, true?  
 5 A. Right.  
 6 Q. And was he on your floor or was he on a  
 7 completely separate floor?  
 8 MR. SCAROLA: As opposed to a partly  
 9 separate floor.  
 10 THE WITNESS: For the most part he was on  
 11 a separate floor.  
 12 BY MR. CRITTON:  
 13 Q. Okay. And were there guards during the  
 14 time that you were at, at the RRA firm, RRA, were  
 15 there ever guards that patrolled the hallways?  
 16 A. Yes.  
 17 Q. And was that from the day you started?  
 18 A. I believe so.  
 19 Q. And had you ever been in a firm where --  
 20 bless you. Had you ever been in a firm where  
 21 there -- well, let me strike that. The guards were  
 22 what, Broward County Sheriff's Officers?  
 23 A. I don't remember the agency but they were  
 24 armed uniformed police officers. I believe Fort  
 25 Lauderdale.

1 A. When I first started I believe that the people  
 2 patrolling, I'm not sure that they initially were  
 3 Broward Sheriffs or Fort Lauderdale police. I think  
 4 that may have been a month after I began. From what I  
 5 remember seeing, and I can envision the people in my  
 6 head, they were private security people. At least that  
 7 was the appearance or the interpretation that I had.  
 8 And I didn't question it at the time who they were.  
 9 Q. Within --  
 10 A. I don't think.  
 11 Q. Within a short period of time though you  
 12 recognized that they were either Sheriff's Deputies  
 13 or police officers?  
 14 A. At the point in time where I recognized that  
 15 they were armed uniformed police officers in the firm,  
 16 yes, I questioned it not only to Russell Adler but to  
 17 anybody else, anybody else, because all of the lawyers  
 18 in the firm thought it was strange.  
 19 Q. Okay. And what did Adler tell you?  
 20 A. That Scott Rothstein has a lot of money, prior  
 21 to you being here, a female attorney was murdered and he  
 22 wants to make sure that his friends and family are as  
 23 secured as possible, that while he has this extra money  
 24 to spend on security, he is going to do that for all of  
 25 our safety.

1 Q. Did you understand as well that he had,  
2 that the firm was paying for armed guards to guard  
3 his house 24 hours a day?

4 A. No.

5 Q. When did you learn that fact?

6 A. After the disbandment of RRA.

7 Q. Did Mr. Adler tell you that Mr. Rothstein  
8 had amazing or substantial wealth?

9 A. I don't know in those words, but I, I  
10 definitely understood that.

11 Q. Okay. In meeting Mr. Rothstein initially,  
12 initially for the ten minutes as you were  
13 contemplating taking a job and on the two other  
14 occasions or the one other occasion when you saw him  
15 out in the restaurant, I think you described him as  
16 flamboyant?

17 A. I'm not sure I used that word but probably one  
18 synonymous, and, yes, I would describe him as such.

19 Q. Was he someone that at least -- well, let  
20 me strike that. Were you aware that he had a, a  
21 watch collection of hundreds of watches?

22 A. No.

23 Q. Did you see him wear expensive jewelry  
24 when you saw him; that is, the few occasions that  
25 you saw him?

1 A. I went there one time.

2 Q. For what occasion?

3 A. I don't remember the occasion, but it was a  
4 gathering that he had at his house and he asked, during  
5 the course of me working there were ten occasions where  
6 everybody was invited to go to his house for various  
7 events and on one occasion, I went.

8 Q. Oh, all right. And from being in his  
9 house did you recognize immediately that this was a  
10 multi-million dollar house?

11 A. Yes.

12 Q. Okay. Was it on the water?

13 A. Yes.

14 Q. And could you tell from the interior  
15 design or the decorations that existed that this was  
16 at least a man, a man that had significant wealth?

17 A. Yes.

18 Q. All right. And could you, did you have an  
19 opportunity to see his collection of automobiles?

20 A. No.

21 Q. During the time that you were in the  
22 house, did you have an opportunity, did, did you  
23 walk around the house?

24 A. No.

25 Q. How many people were there, best estimate?

1 A. Never. I didn't take notice of that.

2 Q. Okay. When you saw him, was he dressed in  
3 a suit or was he dressed in business, or in casual,  
4 more casual clothes?

5 A. Always a suit.

6 Q. And looking like a million bucks?

7 A. Looking ridiculous.

8 Q. But something that looked very expense,  
9 flashy, showy?

10 A. I couldn't tell how expensive it was, but  
11 flashy and showy, yes. It may be a pink shirt with a  
12 purple tie and a blue suit, something that you would  
13 never expect a lawyer to be wearing, yes.

14 Q. And in terms of the, in terms of the, of  
15 his personal wealth or his, his personal assets,  
16 were you aware of where he lived?

17 A. Was I aware when?

18 Q. During the time you worked for RRA.

19 A. Yes.

20 Q. Okay. And were you aware that he was  
21 living in a multi-million dollar house?

22 A. When, when I went to the house I, I recognized  
23 it as such.

24 Q. You said you went to the house. Did you  
25 go to Mr. Rothstein's house?

1 Are we talking like ten or 12?

2 A. No, no, no. 250.

3 Q. Did you talk to Mr. Rothstein at all?

4 A. Not even for a second.

5 Q. Could you walk anywhere in the house that  
6 you wanted?

7 A. The party, at least to the extent that I  
8 participated in it, was outside. So I, I don't know if  
9 I could have walked around the house, but I did not walk  
10 around the house nor did I really walk inside the house  
11 other than to go in the front door, straight out back,  
12 and then leave the exact same pathway that I entered.

13 Q. What his property located on Castillo  
14 Island?

15 A. I don't know.

16 Q. Were you aware or did you become aware  
17 that Mr., during the time that you were there that  
18 Mr. Rothstein had investments in multiple real  
19 properties?

20 A. No.

21 Q. Were you aware at the time that you met  
22 him first at the BOVA restaurant that he had an  
23 interest in BOVA restaurant?

24 A. When I met him, no.

25 Q. Did he have an interest in BOVA restaurant

1 at that time?  
 2 A. I heard that sometime after I began working  
 3 there. He certainly acted like he did.  
 4 Q. Did you learn that he had investments in  
 5 other business entities, whether they were other  
 6 restaurants or other business entities --  
 7 A. Through --  
 8 Q. -- during the time that you worked at RRA?  
 9 A. Through rumors.  
 10 Q. And rumor was he had his fingers in many  
 11 different businesses?  
 12 A. It sounded like hundreds.  
 13 Q. And did you understand that he had a  
 14 substantial collection of automobiles?  
 15 A. What do you mean by substantial selection or  
 16 collection?  
 17 Q. Well, were you, during the time that you  
 18 were at RRA were you aware that he had Ferraris?  
 19 A. No.  
 20 Q. Multiple Ferraris?  
 21 A. No.  
 22 Q. Were you aware that he had a Bentley?  
 23 A. Yes.  
 24 Q. Were you aware that he had a Bugatti?  
 25 A. I heard that.

1 A. No.  
 2 Q. Were you aware that he had multiple jet  
 3 skis?  
 4 A. No.  
 5 Q. Were you aware that he had a 55-foot Sea  
 6 Ray?  
 7 A. No.  
 8 Q. Were you aware that he owned a  
 9 Lamborghini?  
 10 A. No.  
 11 Q. Again during the time that you were at  
 12 RRA?  
 13 A. I understand that. The answer is no.  
 14 Q. In addition to the, to the business of  
 15 owning BOVA what other business ventures did you  
 16 understand he had? I think you said you thought he  
 17 was in hundreds of businesses.  
 18 A. Through a rumor.  
 19 Q. Right.  
 20 A. I understood that he owned a Vodka. I  
 21 understood generically that he owned or purchased  
 22 various patents. I understood -- I didn't know what the  
 23 patents were. I understood that he owned other  
 24 restaurants. I understood that he owned or was partial  
 25 owner of Cafe Iguana.

1 Q. Were you aware that he had a Rolls Royce?  
 2 A. No.  
 3 Q. Were you aware that he had multiple  
 4 Corvettes?  
 5 A. No.  
 6 Q. Either a Corvette or multiple Corvettes?  
 7 A. No.  
 8 Q. Were you aware that he had multiple  
 9 Mercedes Benz?  
 10 A. No.  
 11 Q. Were you aware that he owned a yacht?  
 12 A. Yes.  
 13 Q. Okay. And was that parked behind his  
 14 house?  
 15 A. Yes.  
 16 Q. Were you aware that he also -- and did it,  
 17 if I was to say it was approximately an 85 to  
 18 90-foot yacht or, in fact, an 87-foot yacht?  
 19 A. I wouldn't quarrel with that.  
 20 Q. Did it also appear that he had a  
 21 substantial sport fisherman that was parked out  
 22 there as well?  
 23 A. I didn't see that.  
 24 Q. Were you aware that he had 33-foot Aqua,  
 25 Aquaviva?

1 At some point in time I learned that he  
 2 was owner or partial owner of the Versace mansion.  
 3 And I think in general it was always explained to me  
 4 or I overheard he had, he has his hands in all of  
 5 these, this assortment of businesses and those  
 6 business ventures have done very well, and that is  
 7 the source of his apparent extreme amount of wealth.  
 8 Q. Who told you that?  
 9 A. I don't, I don't know. More, more than one  
 10 person. I mean, that was just kind of the word around  
 11 the campfire so to speak.  
 12 Q. Did you inquire as to -- let me strike  
 13 that. Did you ever see any documents that reflected  
 14 or documents or read any information about  
 15 Mr. Rothstein that preexisted 2002 which was kind of  
 16 the start of the RRA firm?  
 17 A. I don't understand.  
 18 Q. Okay. Well, I think we established  
 19 earlier that your understanding was that RRA kind of  
 20 started as a firm in the 2002 time frame.  
 21 A. Well, you told me that and I have been told  
 22 that after the implosion that that was the time period  
 23 that RRA started. I didn't know anything about Scott  
 24 Rothstein until the year 2009 at all.  
 25 Q. Did you do any research with regard to

1 Mr. Rothstein prior to going to the firm and by  
 2 research I mean people Google. Did you Google him?  
 3 A. No.  
 4 Q. Did you, did the firm have a brochure?  
 5 A. I don't know.  
 6 Q. Did you ever see brochures in the waiting  
 7 room or the reception rooms that described the firm  
 8 when it was founded, background of the firm, et  
 9 cetera?  
 10 A. No.  
 11 Q. Was it on your web site?  
 12 A. Was what on my web site?  
 13 Q. The history or the background of the firm.  
 14 Let me strike that. RRA had a website?  
 15 A. RRA had a website.  
 16 Q. That's no longer in existence, true?  
 17 A. True.  
 18 Q. And --  
 19 A. To my knowledge.  
 20 Q. Did you ever go on the website and  
 21 checkout the web site for the history or the  
 22 background of RRA and Mr. Rothstein?  
 23 A. I went on the website. I don't know that the  
 24 website even had a history. If it did, I don't remember  
 25 ever looking at it.

1 matters with regard --  
 2 MR. CRITTON: Form?  
 3 MR. SCAROLA: -- to these cases?  
 4 MR. CRITTON: Form?  
 5 MR. SCAROLA: No, no. It's a, it's a  
 6 speaking inquiry.  
 7 BY MR. CRITTON:  
 8 Q. Mr. Edwards, did you ever have any  
 9 dealings with Deborah Villegas?  
 10 A. No.  
 11 Q. Am I saying it right?  
 12 A. I don't know.  
 13 Q. V-i-l-l-e-g-a-s?  
 14 A. I've seen the name.  
 15 Q. Did you know who she was?  
 16 A. In what way?  
 17 Q. As it related --  
 18 A. I knew that she worked for the firm.  
 19 Q. What did you understand her position was?  
 20 A. Rothstein's [REDACTED].  
 21 Q. Did you understand her to be the COO of  
 22 the company, of the firm?  
 23 A. Right. I don't know if COO or whatever, but  
 24 his right-hand man; that's the person who gets him what  
 25 he wants. That's at least in a broad term what I

1 Q. Did it, did, at least from what you saw  
 2 and observed of Mr. Rothstein, did it appear to you  
 3 that the, his wealth far exceeded the type of  
 4 business that it appeared to you that the firm was  
 5 doing?  
 6 A. I have no understanding whatsoever. No,  
 7 that's not something that ever crossed my mind.  
 8 Q. Well, under these circumstances is, is  
 9 when you went to the firm, you had the ability to  
 10 your discretion to spend whatever monies you wanted  
 11 in prosecuting your personal injury and Epstein  
 12 cases. You, no one ever turned down a request  
 13 either for a reimbursement or told you not to expend  
 14 any money, true?  
 15 MR. SCAROLA: Objection, compound and  
 16 repetitious.  
 17 THE WITNESS: I don't understand the  
 18 question.  
 19 BY MR. CRITTON:  
 20 Q. No one, as to any expenditure that you  
 21 ever made on an Epstein case --  
 22 MR. SCAROLA: Isn't this about the fourth  
 23 time that you're eliciting exactly the same  
 24 testimony? Isn't it very clear the extent to  
 25 which Mr. Edwards had control over financial

1 understood her position to be.  
 2 Q. Did you understand she was a financial  
 3 person?  
 4 A. No.  
 5 Q. Or an administrative person?  
 6 A. My understanding was administrative.  
 7 Q. With regard to Mr. Rothstein's; that is,  
 8 his real property, his vehicles, his boats, his  
 9 business interests, would it be a correct statement,  
 10 sir, that you weren't concerned about the source of  
 11 his wealth?  
 12 A. You went through a list of the things that I  
 13 knew or did not know him to have in terms of assets.  
 14 And I told you for the most part I didn't even know that  
 15 he had those things. In fact, while you were out of the  
 16 room, I just educated myself by reading the information  
 17 on some of the things he had and I didn't know until  
 18 right now that he had those things. But certainly while  
 19 I was working at RRA I didn't know that he had those  
 20 things.  
 21 Q. Then let me be specific. With regard to  
 22 the, with regard to the house that you knew he had,  
 23 with regard to the yacht that you knew he had, with  
 24 regard to the vehicles that you knew he had, with  
 25 regard to the business interests, at least BOVA and

1 at least what was rumored to be his business  
2 interest, did you believe that the source of his, of  
3 his apparent wealth was as a result of the law firm?

4 A. I believe that the source of his wealth was  
5 the law firm as well as the, what I have described as an  
6 assortment of businesses that he had his hands in of  
7 which only a fraction I was aware.

8 Q. Well, what did you understand to be the  
9 source of the funding of the, of the Epstein cases  
10 and the other lawsuits that you had?

11 A. The checks I believe were written by the law  
12 firm.

13 Q. Okay. And what did you believe was the  
14 source of the monies that the law firm got to expend  
15 some, just on the three cases that you had with Mr.  
16 Epstein, some three to \$500,000, I mean separate and  
17 apart from all of the, your other personal injury  
18 cases and separate and apart from all of the other  
19 69 lawyers who were in the law firm who also had  
20 cases?

21 A. I didn't have a belief at all as to the source  
22 of any of the monies that were used for any of the case.

23 Q. Was it your position it really wasn't your  
24 concern; that is, wherever the money came from, it  
25 didn't bother you; all you knew is that the firm was

1 funding your cases?

2 MR. SCAROLA: Objection, argumentative.

3 THE WITNESS: Yeah. At the time I believe  
4 that I am working at a well recognized law firm  
5 with good people and that is a successful law  
6 firm and this is the way that law firms at that  
7 level operate, and right, I didn't --

8 BY MR. CRITTON:

9 Q. Didn't care?

10 A. Right, I didn't care. I didn't question it.

11 Q. With, with regard to, let me ask you some  
12 names and see if you recognize the names. Do you  
13 know a person by the name of Barry Bekkadan,  
14 B-k-k-a-d-a-n?

15 A. Never heard the name until right now.

16 Q. A.J. Discala?

17 A. Again same answer.

18 Q. Clockwork Capital Advisers?

19 A. No, never heard of them.

20 Q. Razorback Funding?

21 A. Nerve heard of it.

22 Q. Michael Szafranski, S-z-a-f-r-a-n-s-k-i?

23 A. Heard that name --

24 Q. And --

25 A. -- only after implosion and through papers and

1 things of that nature.

2 Q. And that's my question to you: Did you  
3 hear these names before or during the time that you  
4 were at RRA as distinct from now?

5 A. Of that list you just read until right this  
6 second, Michael Szafranski is the only one that I have  
7 ever heard of and that was after implosion of RRA

8 Q. And again this question is specific to the  
9 time frame --

10 A. Sure.

11 Q. -- that you were there? Dominic  
12 Ponatchio, P-o-n-a-t-c-h-i-o.

13 A. No.

14 Q. Moto, M-o-t-o, Ban, B-a-n, Adon, A-d-o-n?

15 A. No.

16 Q. Ever heard of Benozon (phonetic) Varon,  
17 V-a-r-o-n?

18 A. No.

19 Q. Onyx Capital?

20 A. No.

21 Q. Onyx Options Consultants?

22 A. No.

23 Q. BWS Investments?

24 A. No.

25 Q. Pirulin, P-i-r-u-l-i-n, Group?

1 A. No.

2 Q. Shimone (phonetic) Levy, L-e-v-y?

3 A. No.

4 Q. Obidia Levy, O-b-i-d-█, I'm sorry, d-i-a?

5 A. No.

6 Q. Daniel Minkowitz, M-i-n-k-o-█-i-t-z?

7 A. No.

8 Q. Fortress, an entity know as Fortress  
9 Investments or Fortress Capital?

10 A. No.

11 Q. Drawbridge?

12 A. No.

13 Q. Capital or funding?

14 A. No.

15 Q. Do you know an individual by the name of,  
16 have you ever heard of, heard during that time  
17 period, did you hear of or know a person named  
18 George Levin, █-█-v-i-n?

19 A. No.

20 Q. Banyan Investment Fund?

21 A. No.

22 Q. Did you know or hear of the name Frank  
23 Preve, P-r-█-v-█?

24 A. No.

25 Q. Okay. Mr. Preve is purportedly, was

1 purported to have an office within RRA's offices.  
 2 Have you seen that?  
 3 A. Have I seen what?  
 4 Q. Have you seen that in any of the news  
 5 media, that Mr. Preve had an office within RRA?  
 6 A. That name doesn't sound familiar at all. So,  
 7 no, the answer to your question is no, I haven't seen  
 8 that.  
 9 Q. Bill Brock?  
 10 A. Yes.  
 11 Q. Okay. Who is Mr. Brock?  
 12 A. In the law firm he went by the name Uncle  
 13 Bill.  
 14 Q. Okay. All right. Who is Uncle Bill?  
 15 A. Who do I understand him to be? I don't know  
 16 who he really was. At this point in time looking back,  
 17 there is no telling what anyone, what anyone or anything  
 18 was. But at the time I believe that he was a relative  
 19 of Scott Rothstein's.  
 20 Q. What did he do? What did, what did Uncle  
 21 Bill do --  
 22 A. Some --  
 23 Q. -- at the firm?  
 24 A. Something with money.  
 25 Q. Did he have an office at the firm?

1 A. No.  
 2 Q. Ed Morse?  
 3 A. No.  
 4 Q. Richard Pearson, P-a-r-s-o-n?  
 5 A. No.  
 6 Q. Steven Levin, L-v-i-n?  
 7 A. No.  
 8 Q. Ira Sochet? S-h or Sochet, S-o-c-h-t?  
 9 A. No.  
 10 Q. Mark Melvin?  
 11 A. No.  
 12 Q. Jack Samoney (phonetic)?  
 13 A. No.  
 14 Q. Lawrence King?  
 15 A. No.  
 16 Q. Steve Jackel?  
 17 A. No.  
 18 Q. Have you ever heard an attorney name  
 19 Michael Legamaro?  
 20 A. No.  
 21 Q. Kevin Draher, D-r-a-h-r?  
 22 A. No.  
 23 Q. David Boden, do you know David Boden?  
 24 A. Yes.  
 25 Q. Okay. Who is Mr. Boden, an associate --

1 A. I think the trustees are still trying to  
 2 figure out what he exactly did do.  
 3 Q. Did you have any dealings with him?  
 4 A. Dealings, no, I didn't have dealings.  
 5 Q. Dealings of any kind?  
 6 A. I talked to him.  
 7 Q. Did you ever discuss any of your cases?  
 8 Was he -- he wasn't a lawyer?  
 9 A. Far from it.  
 10 Q. All right. Did you ever discuss any of  
 11 your cases with him?  
 12 A. No.  
 13 Q. Just a hi, hello?  
 14 A. Hi, hello, and I was one of the lawyers who  
 15 would come in often and work on weekends and he would be  
 16 there. That's when I would see him, and he would kind  
 17 of, hey, how are you doing on a weekend.  
 18 Q. And do you know a Dean Kretchmar,  
 19 K-r-e-t-c-h-m-a-r?  
 20 A. No.  
 21 Q. Same question again, do, these names  
 22 during the time period, Doug Van Allman,  
 23 A-l-l-m-a-n?  
 24 A. No.  
 25 Q. Ted Morse?

1 A. Are you asking me what I know now or what I  
 2 thought then?  
 3 Q. Who did you understand Mr. Boden, David  
 4 Boden to be when you became employed or associated  
 5 with RRA in April of '09?  
 6 A. In April of '09 I had not heard the name but  
 7 let's just skip to it. Sometime in let's say June or  
 8 July, I am guessing, sometime during the summer, I  
 9 understood him to be a lawyer at the firm.  
 10 Q. Did you understand, did you understand he  
 11 was a Florida lawyer or you just understood he was a  
 12 lawyer?  
 13 A. I understood he was a lawyer. I made the  
 14 presumption or assumption at that time that since he was  
 15 a lawyer for RRA that he was a Florida lawyer. I have  
 16 subsequently learned otherwise.  
 17 Q. Did you know, did you ever have any  
 18 business dealings with Mr. Boden?  
 19 A. Never spoke a word to the guy.  
 20 Q. What did you understand that he actually  
 21 did at the firm?  
 22 A. Had no idea.  
 23 Q. How about Andrew Barnett?  
 24 A. Don't know who that is.  
 25 Q. There was an individual, he is described

1 as the director of Corporate Development for RRA  
 2 A. I don't know even know what that means.  
 3 Q. Have you ever heard of the Centurion  
 4 Credit Fund or the Platinum Management Fund?  
 5 A. No.  
 6 Q. Alan Sakowitz?  
 7 A. No. Wait. Alan Sakowitz. I have heard that  
 8 name recently. I don't know why. I believe I actually  
 9 heard that name in a response. Never mind. In some  
 10 nonresponsive answer that your client gave, I heard that  
 11 name.  
 12 MR. SCAROLA: Keep going.  
 13 BY MR. CRITTON:  
 14 Q. Mr. Edwards, with regard to your phone,  
 15 did you have a direct line at RRA?  
 16 A. Yes.  
 17 Q. What was that phone number?  
 18 A. I don't remember.  
 19 Q. And is your cellphone today the same as it  
 20 was back then?  
 21 A. Yes.  
 22 Q. And what's that number, please?  
 23 MR. SCAROLA: Cellphone number?  
 24 THE WITNESS: [REDACTED]  
 25

1 Fistos is my partner now. Marc Nurik is the lawyer who  
 2 represents Scott Rothstein now. I don't know which it  
 3 was, but it was one of the two.  
 4 Q. Okay. Were you ever present at a meeting  
 5 where someone who you didn't know was present when  
 6 the Epstein case was discussed?  
 7 A. No.  
 8 Q. Were you ever asked to get on a phone call  
 9 where the Epstein cases were discussed that you  
 10 didn't, that you couldn't confirm who, you may have  
 11 someone who may have said this is Joe Smith on the  
 12 other line, but where you discussed the Epstein case  
 13 over the phone with another lawyer from your firm?  
 14 A. I don't understand that question.  
 15 Q. Did you ever make a phone call or did you  
 16 ever receive a phone call where you discussed the  
 17 Epstein case with another lawyer in your firm; that  
 18 is, that person --  
 19 A. Yes.  
 20 Q. -- outside of the office?  
 21 A. What?  
 22 Q. Okay. Obviously you would get calls  
 23 within --  
 24 A. Even you.  
 25 Q. -- the confines of your office. Right. I

1 BY MR. CRITTON:  
 2 Q. Did you ever have a firm cellphone or just  
 3 your own personal cellphone?  
 4 A. No. Just my own personal cellphone.  
 5 Q. During the time that you were at the firm,  
 6 were you ever involved in making any type of a  
 7 presentation to anyone regarding the Epstein cases?  
 8 A. Including other lawyers within the firm?  
 9 Q. Let me rephrase it. I am going to  
 10 rephrase. You already told us that you have talked  
 11 about the Epstein cases with other lawyers, correct?  
 12 A. Right.  
 13 Q. Were you ever present in a meeting where  
 14 there was a person whom you did not know wherein the  
 15 Epstein, where the Epstein cases were discussed?  
 16 A. No.  
 17 Q. At the, 0when you met with Mr. Rothstein  
 18 in his office when Mr. Adler or whoever asked you to  
 19 come up that one time and there was Adler, Rothstein  
 20 and yourself, you said there was an individual on  
 21 the phone?  
 22 A. Right. It was another lawyer with the firm.  
 23 Q. And how do you know it was another lawyer  
 24 with the firm?  
 25 A. It was either Marc Nurik or Mark Fistos, Mark

1 understand that.  
 2 A. You fall in that category. I am having a hard  
 3 time.  
 4 Q. The question is did you ever have, were  
 5 you ever conferenced in on a call that was supposed  
 6 to be among RRA lawyers regarding an Epstein case?  
 7 A. No.  
 8 Q. Did anyone ever request that you prepare a  
 9 summary of any of your Epstein cases that you in  
 10 turn sent by either e-mail or memo to anyone else?  
 11 A. I don't believe so.  
 12 Q. After you joined the RRA firm in April of  
 13 '09, did there come a point in time when you  
 14 requested that, that you requested the depositions  
 15 be taken out of state of a number of witness? Well,  
 16 let me ask you this question.  
 17 MR. CRITTON: Let me, let make it easy.  
 18 Let me show what I will mark as Exhibit 3.  
 19 (Plaintiff's Exhibit No. 3 was marked for  
 20 identification.)  
 21 BY MR. CRITTON:  
 22 Q. Before I get to that, Mr. Edwards, were  
 23 you aware of any cases that Mr. Rothstein himself  
 24 settled for over \$5 million while you were employed  
 25 at the firm?

1 A. I was never aware of any cases that Rothstein  
 2 even handled much less settled.  
 3 Q. Were you aware of whether, did anyone ever  
 4 tell you whether Mr. Rothstein even did legal work  
 5 at the firm or whether he was just a rainmaker?  
 6 A. I -- no, no one ever told me one way or the  
 7 other.  
 8 Q. Would it be a correct statement that you  
 9 never saw him perform any legal work during the time  
 10 you were at the firm?  
 11 A. That's a correct statement.  
 12 Q. Would it be a correct statement as far as  
 13 you knew he was kind of a gadfly going to his  
 14 various business ventures and then he would hole  
 15 himself up in the office.  
 16 A. He was the guy on the billboards and at the  
 17 Triple A arena and everything else marketing the firm  
 18 and bringing business in, and that's at least what I  
 19 believe he did. If it's true or not, I don't know to  
 20 this day.  
 21 Q. With regard to Exhibit 3, do you recognize  
 22 this e-mail?  
 23 A. I, I don't recognize the e-mail.  
 24 Q. Do you recognize, and I will represent to  
 25 you that I received the e-mail. It was sent to me

1 Q. Do you recall sending or directing that  
 2 this facsimile be sent. Or let me strike that. Who  
 3 was your secretary at that time? Who is, well, BJE  
 4 is you. Who is the MGL?  
 5 A. Who is the MGL? Let's see.  
 6 Q. On Page 2. There are your initials,  
 7 Bradley J. Edwards, BJE, and then MGL. Do you  
 8 recognize that?  
 9 A. No. I mean, as you are very aware problems  
 10 with secretaries during that period of time, I, I had  
 11 more than my share and that could have been a time  
 12 period where I did not have a legal assistant at all.  
 13 And I do not recognize the initials MGL to identify  
 14 anybody that I know.  
 15 Q. With regard to the individuals who were  
 16 listed in Exhibit 3, specifically Donald Trump,  
 17 Leslie Wexner, Bill Clinton, with those individuals,  
 18 you sent out this facsimile or at least your office  
 19 sent out the fax, Exhibit 3, requesting dates for  
 20 these individuals to be deposed, correct?  
 21 A. Yes.  
 22 Q. All right. Prior to your joining RRA you  
 23 had never requested either that the deposition of  
 24 Mr. Trump be taken, Mr. Wexner, nor Bill Clinton,  
 25 correct?

1 as well although I am not shown as a recipient, I  
 2 received e-mail.  
 3 THE WITNESS: Are you talking about the  
 4 fax?  
 5 MR. CRITTON: I am sorry, the fax.  
 6 MR. SCAROLA: Exhibit, Exhibit 3.  
 7 MR. CRITTON: Exhibit 3. Let me start  
 8 again. Exhibit 3 is a fax.  
 9 THE WITNESS: Correct.  
 10 MR. CRITTON: Dated July 22nd, 2009.  
 11 THE WITNESS: I recognize that.  
 12 BY MR. CRITTON:  
 13 Q. And do you recognize on Page 2, it says  
 14 very truly yours, Rothstein, Rosenfeldt, Alder and  
 15 then there is a, what appears to be a signature and  
 16 under that it says Bradley J. Edwards, Esquire,  
 17 partner for (sic) the firm. Do you see that?  
 18 A. Yes, I see that.  
 19 Q. Do you recognize the signature?  
 20 A. No.  
 21 Q. Is that how you sign your name?  
 22 A. No.  
 23 Q. Do you know whose signature that is or  
 24 purports to be?  
 25 A. I have absolutely no idea.

1 A. I never requested a deposition to be taken  
 2 including any deposition of those three individuals.  
 3 Q. I understand but all right.  
 4 A. The answer to your question is, yes.  
 5 Q. All right. Thank you. Paula Heil, do you  
 6 know who that person is?  
 7 A. Do I know who it is? I know that it's  
 8 somebody who was involved with Bear Sterns at some point  
 9 in time.  
 10 Q. You also requested dates, and in fact  
 11 served a subpoena on Alan Dershowitz, the Harvard  
 12 law professor, correct?  
 13 A. Correct.  
 14 Q. And Mr. Dershowitz you were aware was one  
 15 of Mr. Epstein's criminal defense lawyers, correct?  
 16 A. At some point in time, I knew that in the past  
 17 he had been an attorney of Mr. Epstein.  
 18 Q. Well, you had, you had certain records  
 19 from the State Attorney's Office, didn't you, or  
 20 from the police report?  
 21 A. And that's what I'm saying, yes, involved in  
 22 the civil cases with us, no, I didn't know that he had  
 23 involvement. But, yes, I did know he was a former --  
 24 Q. I'm sorry, go ahead --  
 25 A. I did know that he was a former attorney of

1 Jeff Epstein.  
 2 Q. Well, you also understood Mr. Epstein has  
 3 had ongoing criminal law issues even during the time  
 4 of the civil case, correct?  
 5 A. No.  
 6 Q. Sure. Well, you were aware that  
 7 Mr. Epstein was operating under the nonprosecution  
 8 agreement, that he was bound by the, a  
 9 nonprosecution agreement, correct?  
 10 A. I'm aware of the existence of a nonprosecution  
 11 agreement.  
 12 Q. Well, and in fact you came into possession  
 13 of the nonprosecution agreement sometime in 2008  
 14 because Judge Marra ordered that, ordered the United  
 15 States Government to turn over to all of the  
 16 attorneys and the clients who were listed as alleged  
 17 victims, correct?  
 18 A. Yes.  
 19 Q. So, you had possession of the N.P.A. as of  
 20 sometime in the year 2008, correct?  
 21 A. Right.  
 22 Q. All right. And so you, and you were aware  
 23 that under the nonprosecution agreement Mr. Epstein  
 24 was required to meet certain requirements, that  
 25 Mr. Epstein had a requirement to meet certain

1 Tommy Mottola was listed. Do you know who  
 2 Mr. Mottola is?  
 3 A. Generally I think I know who that is.  
 4 Q. Who did you understand Mr. Mottola was?  
 5 A. Something to do with the music industry.  
 6 Q. All right. And the name David Copperfield  
 7 was also referenced as a potential witness in the  
 8 case, correct?  
 9 A. That is correct.  
 10 Q. All right. And did you -- and you, in  
 11 fact, attempted to coordinate a deposition for  
 12 Mr. Copperfield; is that correct?  
 13 MR. SCAROLA: Are you asking about whether  
 14 communications occurred with you --  
 15 MR. CRITTON: Sure.  
 16 MR. SCAROLA: -- regarding such a  
 17 deposition.  
 18 BY MR. CRITTON:  
 19 Q. Let me rephrase it. With regard to the  
 20 lawyers in the case, including myself, you attempted  
 21 to coordinate a time for completing or taking the  
 22 deposition of Mr. Copperfield, Mr. Mottola, who I  
 23 will represent is the former president of Sony  
 24 Records, former president Bill Clinton, Alan  
 25 Dershowitz, Donald Trump, and Leslie Wexner, true?

1 standards or certain provisions of the agreement  
 2 otherwise the U.S.A. could potentially declare there  
 3 was a breach of the agreement, true?  
 4 A. I suppose.  
 5 Q. Well, you're a former prosecutors too, so  
 6 you knew what a nonprosecution agreement was, true?  
 7 A. No, I had never seen a nonprosecution  
 8 agreement in my life before this one.  
 9 Q. When you got the nonprosecution agreement,  
 10 you reviewed it?  
 11 A. Yes, I did.  
 12 Q. So, you were familiar with?  
 13 A. Right.  
 14 Q. And you understood from at least looking  
 15 at the police report that you had access to, that  
 16 Mr. Dershowitz had represented Mr. Epstein with  
 17 regard to negotiating his plea that ultimately was  
 18 reached in negotiations with the federal government,  
 19 true?  
 20 A. I knew he played a role.  
 21 Q. Now, with regard to Mr., with regard to  
 22 the depositions of -- well, let me strike that.  
 23 Also listed both on your, on Jane Doe's and [REDACTED]'s  
 24 and [REDACTED]'s updated interrogatory answers which were  
 25 provided during the year 2009, an individual named

1 A. False.  
 2 Q. Which of those, as to which one of those  
 3 is that false?  
 4 A. Tommy Mottola.  
 5 Q. So, but you did attempt to coordinate the  
 6 depositions of Donald Trump, Mr. Dershowitz former  
 7 president Clinton, David Copperfield, and Leslie  
 8 Wexner, correct?  
 9 A. I believe so.  
 10 Q. And with regard to Mr., well, let me  
 11 strike that. In setting these depositions; that is,  
 12 in requesting these deposition be taken sometime in  
 13 June and July of 2009 or requesting dates for them,  
 14 did you have discussions with other attorneys in  
 15 your firm as to the benefits that would exist in  
 16 your case, your three cases against Mr. Epstein by  
 17 taking these individuals' depositions?  
 18 MR. SCAROLA: Objection. Same as grounds  
 19 previously stated; instruct you not to answer.  
 20 BY MR. CRITTON:  
 21 Q. Mr. Edwards, were you involved in the  
 22 discussions regarding the deposing of any of the  
 23 people of these individuals, Mr. Trump; that is, in  
 24 discussions with any other lawyers in your firm  
 25 including Scott Rothstein?

1 MR. SCAROLA: Same objection, same  
 2 instruction.  
 3 BY MR. CRITTON:  
 4 Q. Same question with regard to  
 5 Mr. Dershowitz, former president Clinton, Tommy  
 6 Mottola, David Copperfield, and Leslie Wexner.  
 7 THE WITNESS: No.  
 8 MR. SCAROLA: Same objection, same  
 9 instruction?  
 10 THE WITNESS: And with respect to Tommy  
 11 Mottola, I, that was not my firm that was a  
 12 separate law firm that intended to take his  
 13 deposition.  
 14 BY MR. CRITTON:  
 15 Q. Who was it that you understood was taking  
 16 Mr. Mottola's deposition?  
 17 A. Searcy, Denney.  
 18 Q. Did you ever discuss with Mr. Rothstein or  
 19 anyone on his behalf the value of taking the  
 20 depositions of Trump, Dershowitz, former president  
 21 Clinton, David Copperfield, and Leslie Wexner as an  
 22 inducement to get Mr. Epstein to settle his  
 23 lawsuits?  
 24 MR. SCAROLA: You have already inquired of  
 25 Mr. Edwards about the communications that he

1 BY MR. CRITTON:  
 2 Q. First, my question in the broad sense.  
 3 Were you involved in the decision to pursue flight  
 4 data associated with any planes purportedly own by  
 5 Mr. Epstein?  
 6 MR. SCAROLA: My objection --  
 7 MR. CRITTON: In terms of the discussions  
 8 within your firm.  
 9 MR. SCAROLA: My objection and my  
 10 instruction stands.  
 11 BY MR. CRITTON:  
 12 Q. Did you have discussions within your firm  
 13 with regard to taking the depositions of celebrities  
 14 or famous people who were on, purportedly on  
 15 Mr. Epstein's planes so that they could be deposed  
 16 such that that would be an inducement to Mr. Epstein  
 17 to settle his lawsuit?  
 18 MR. SCAROLA: Same objection, same  
 19 instruction.  
 20 BY MR. CRITTON:  
 21 Q. Isn't it true, Mr. Edwards, that in taking  
 22 the deposition or in attempting to take the  
 23 deposition of Donald Trump, you had no information  
 24 that Mr. Trump had any knowledge of any female  
 25 having; that is, underage female ever having been on

1 had with Mr. Epstein. He has responded to  
 2 those questions previously. So, any further  
 3 questioning along those lines is entirely  
 4 repetitious.  
 5 BY MR. CRITTON:  
 6 Q. Can you answer that question, sir? Would  
 7 you like it read back?  
 8 MR. SCAROLA: Beyond what he has already  
 9 responded, we would object on the basis of  
 10 work-product and attorney-client privilege and  
 11 I instruct you not to answer.  
 12 THE WITNESS: Okay.  
 13 BY MR. CRITTON:  
 14 Q. Were you involved in any of the decision  
 15 to pursue obtaining flight data from Mr. Epstein?  
 16 Well, let me strike that. Were you involved in the  
 17 decision to pursue flight data associated with any  
 18 planes that were purportedly owned by Mr. Epstein?  
 19 MR. SCAROLA: I will allow Mr. Edwards to  
 20 acknowledge whether he did or did not  
 21 communicate about such matters with opposing  
 22 counsel. But beyond that I would assert  
 23 attorney-client and work-product privileges and  
 24 instruct you not to answer.  
 25

1 Mr. Epstein's plane and been, and having been  
 2 assaulted by him?  
 3 MR. SCAROLA: What Mr. Edwards knew or  
 4 didn't know in connection with this prosecution  
 5 of pending claims is protected by a privilege.  
 6 I instruct him not to answer.  
 7 BY MR. CRITTON:  
 8 Q. Mr. Edwards, did you know Officer Recarey?  
 9 I mean, I know you have meet him now because you  
 10 have seen him at his deposition, correct?  
 11 A. Correct.  
 12 Q. Did you ever meet with, did you ever meet  
 13 Mr. or Officer Recarey at any time prior to his  
 14 deposition in person?  
 15 A. No.  
 16 Q. Have you ever spoken with Officer Recarey  
 17 at any time prior to his deposition, by phone or  
 18 otherwise?  
 19 A. Yes.  
 20 Q. Okay. And what context were you speaking  
 21 with Officer Recarey?  
 22 THE WITNESS: Answer?  
 23 BY MR. CRITTON:  
 24 Q. Well, first of all, let me withdraw that  
 25 question. Excuse me. On how many occasions have

1 you spoken with Officer Recarey prior to his  
2 deposition?

3 A. One time.

4 Q. And when was that?

5 A. 2008.

6 Q. What was the purpose of the -- let me  
7 strike that. Did you initiate the conversation or  
8 did he?

9 THE WITNESS: Answer?

10 MR. SCAROLA: You can answer that.

11 THE WITNESS: I did.

12 BY MR. CRITTON:

13 Q. Okay. What was the purpose of your  
14 conversation?

15 MR. SCAROLA: To the extent that the  
16 purpose of your conversation was unrelated to  
17 any pending legal matter, including in  
18 particular the claims against Mr. Epstein, you  
19 may answer. To the extent that it had anything  
20 at all to do with Mr. Epstein, you should not  
21 respond on the basis of privilege.

22 THE WITNESS: Privilege.

23 BY MR. CRITTON:

24 Q. Did you ever speak with Chief Reiter at  
25 any time -- well, let me strike that. You were not

1 proceeding relating to any matter during the year  
2 2008 or 2009?

3 MR. SCAROLA: You may answer.

4 THE WITNESS: No.

5 BY MR. CRITTON:

6 Q. Did Jane Doe ever come -- let me strike  
7 that. Did Jane Doe ever come to your firm, the RRA  
8 firm for any reason?

9 A. Yes.

10 Q. On how many occasions did she come to your  
11 firm, to RRA?

12 A. I believe one time.

13 Q. In addition to, I assume you met with her  
14 on that occasion?

15 A. Right.

16 Q. Was anyone else present?

17 A. I don't believe so.

18 Q. Did [REDACTED] ever come to your firm at RRA?

19 A. No.

20 Q. Did [REDACTED] ever come to your firm at RRA?

21 A. Yes.

22 Q. On how many occasions?

23 A. One time.

24 Q. Did anyone meet with her other than  
25 yourself?

1 at his deposition, were you?

2 A. No.

3 Q. Okay. Have you ever spoken with Chief  
4 Reiter at any time for any purpose as it relates to  
5 Mr. Epstein?

6 THE WITNESS: Answer?

7 MR. SCAROLA: Only to the extent that --  
8 well, you asked specifically whether the  
9 conversation related to Epstein?

10 THE WITNESS: Did the conversation occur  
11 is the question.

12 MR. SCAROLA: Relating to Epstein. Read  
13 the question back if you would, please.

14 MR. CRITTON: Let me rephrase it.

15 MR. SCAROLA: Okay.

16 BY MR. CRITTON:

17 Q. With regard to Chief Reiter, have you ever  
18 spoken with Chief Reiter or now former Chief Reiter  
19 from the Palm Beach Police Department for any  
20 reason?

21 MR. SCAROLA: You can answer the "for any  
22 reason" part.

23 THE WITNESS: No.

24 BY MR. CRITTON:

25 Q. Have you ever testified in a grand jury

1 A. Yes.

2 Q. Who was present?

3 A. Bill Berger.

4 Q. Did any RRA lawyer ever have an occasion  
5 to meet with Jane Doe at, at a location other than  
6 your office; that is, did you ever request that some  
7 other lawyer meet with her, Jane Doe, for a specific  
8 reason? Don't want to know the reason just whether  
9 another lawyer met with her.

10 A. No.

11 Q. Did any other RRA lawyer meet with [REDACTED]  
12 separate, at any time?

13 A. No.

14 Q. Did any other lawyer ever meet with [REDACTED]  
15 separate and apart from the one meeting that you had  
16 with Bill Berger and yourself in 2000 -- I'm sorry  
17 did --

18 A. We're talking always about the time period at  
19 RRA I understand that.

20 Q. Correct. Did any lawyer from RRA ever  
21 meet with [REDACTED] separate from the single occasion  
22 that you and Mr. Berger met with her at RRA's  
23 office?

24 A. No.

25 Q. Did, did you ever have any type of

1 communication, and by that I mean either a  
2 conversation or any writing with Mr. Scott Rothstein  
3 about the value of the J -- of the Jeffrey Epstein  
4 cases?

5 MR. SCAROLA: You can answer yes or no.

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. Did you ever have a conversation or  
9 communication where Scott Rothstein was present and  
10 the value of the Epstein cases was discussed?

11 A. No.

12 Q. Did you ever have a conversation with  
13 other attorneys at RRA regarding the value of the J,  
14 of the Epstein cases that you had?

15 A. Yes.

16 Q. Okay. With whom?

17 A. Russell Adler, Bill Berger. I believe that's  
18 it.

19 Q. From, from your observations when you were  
20 at RRA, did it appear that certain individuals had  
21 access to Mr. Rothstein; that is, other lawyers in  
22 the firm had access to him?

23 A. It appeared to me like nobody had access to  
24 him.

25 Q. In the particular instance that you got

1 not, just did you just not have an understanding?

2 A. I had an understanding.

3 Q. Okay. What was your understanding and  
4 what was it based on?

5 A. Based on numerous conversations with Russell  
6 Adler that even he had a very difficult time gaining  
7 access to Scott Rothstein for any reason.

8 Q. Did Mr. Adler, did you ever ask Mr. Adler  
9 to pass on information to Mr. Rothstein about the  
10 Epstein cases?

11 A. No.

12 Q. Other than Mr. Jenne who would make, I  
13 think you indicated earlier, on eight to ten  
14 occasions ask you about the Rothstein, I am sorry,  
15 asked you about the Epstein cases, did any other  
16 person inquire on a somewhat regular basis or even  
17 an irregular basis as to the status of the Epstein  
18 cases?

19 A. Yes.

20 Q. Who?

21 MR. SCAROLA: Again I assume you're  
22 talking about persons within the firm?

23 MR. CRITTON: Correct. I'm back to only  
24 within RRA. You understood that, didn't you,  
25 Mr. Edwards?

1 called up to his office, Mr. Adler was present along  
2 with Mr. Rothstein and either Mr. Nurik or somebody  
3 else who was on the phone, correct? We already  
4 established that?

5 A. Correct.

6 Q. From your observations and or your  
7 conversations with Mr. Adler, did you get the  
8 impression that Mr. Adler could have or would have  
9 access to Mr. Rothstein?

10 MR. SCAROLA: By that I assume you mean  
11 unfettered access?

12 MR. CRITTON: No, just easy access.  
13 Unfettered suggests someone can walk in and out  
14 of the office and you already told me it was a  
15 compound. Let me reask my question.

16 BY MR. CRITTON:

17 Q. From what Mr. Adler told you, if you had a  
18 conversation with Mr. Adler about a particular,  
19 whether it was an Epstein case or another case, was  
20 it your understanding that Mr. Adler had regular,  
21 some form of regular communication with  
22 Mr. Rothstein?

23 A. No.

24 Q. Okay. Did you understand that he didn't  
25 have any communication with Mr. Rothstein or did you

1 THE WITNESS: No, I didn't. I thought you  
2 meant anybody.

3 BY MR. CRITTON:

4 Q. Okay. Then I am back within RRA because I  
5 had asked you about Mr. Jenne.

6 A. Got it.

7 Q. So, I wouldn't go out. I want to stay  
8 within the firm. Did anyone ask you or inquire of  
9 you about the status of the RRA cases; it was either  
10 a lawyer or an investigator within the firm?

11 A. Maybe but, but none that I can really picture  
12 as somebody who would do it regularly. If I was talking  
13 in some lawyer's office about any case or any issue,  
14 there were times where I remember generally how is this  
15 specific case going or that specific case, and at times  
16 it was Jeffrey Epstein case.

17 Q. With regard to Mr. Jenne, what did you  
18 understand with regard to what his position was in  
19 the firm?

20 A. Something to do with the investigative  
21 department.

22 Q. Okay. What did you understand about  
23 Mr. Jenne's background. Let me strike that. Were  
24 you a State Attorney's when Mr. Jenne was a Broward  
25 County Sheriff?

1 A. I believe so.  
 2 Q. Were you still a State Attorney when  
 3 Mr. Jenne was indicted and then eventually ended up  
 4 in jail?  
 5 A. No.  
 6 Q. Were you in private practice at that  
 7 point?  
 8 A. Correct.  
 9 Q. But you lived then in Broward County, so  
 10 you followed the developments of Mr. Jenne's  
 11 downfall in becoming a convicted felon?  
 12 A. I was aware.  
 13 Q. All right. Was Mr. Jenne, would it be a  
 14 correct statement that Mr. Jenne and Mr. Fisten and  
 15 Mr. Roberts were all at the RRA firm when you  
 16 started in April of '09?  
 17 A. I don't believe so.  
 18 Q. Which one was there when you started?  
 19 When I say "there," was already employed by RRA when  
 20 you started?  
 21 A. I am not sure if any of the three were there  
 22 but perhaps all of them were there.  
 23 Q. All you know is at some point you came to  
 24 be involved with them as investigators?  
 25 A. Correct.

1 A. No.  
 2 Q. Did you ever find it strange that  
 3 Mr. Jenne was asking you questions about the Epstein  
 4 cases?  
 5 A. No.  
 6 Q. Did you ever ask Russell Adler as to why  
 7 Mr. Jenne would be asking you questions about the  
 8 Epstein cases?  
 9 A. No.  
 10 Q. And I think you told me earlier, but I may  
 11 be wrong so I want to clear this up. I don't want  
 12 to be repetitious here. Did Mr. --  
 13 MR. SCAROLA: When did you change your  
 14 mind about that?  
 15 MR. CRITTON: Earlier.  
 16 BY MR. CRITTON:  
 17 Q. Did Mr. Jenne, did you ever direct  
 18 Mr. Jenne to do any investigation on the Epstein  
 19 cases?  
 20 MR. SCAROLA: Objection, work-product.  
 21 BY MR. CRITTON:  
 22 Q. Did Mr. Jenne ever do any investigation on  
 23 the Epstein files?  
 24 MR. SCAROLA: Objection, work-product.  
 25

1 Q. All right. With regard to Mr. Jenne, was  
 2 his office on the same floor as yours?  
 3 A. No.  
 4 Q. Where, was his office in any way near  
 5 Mr. Rothstein's?  
 6 MR. SCAROLA: What does any way near Mr.  
 7 Rothstein's mean?  
 8 MR. CRITTON: Same floor.  
 9 THE WITNESS: No.  
 10 BY MR. CRITTON:  
 11 Q. Did it appear to you that -- well, let me  
 12 strike that. You said that Mr. Jenne had something  
 13 to do with investigation, correct?  
 14 A. Correct.  
 15 Q. Okay. Did he ever describe for you what  
 16 he did for the firm?  
 17 A. No.  
 18 Q. And I think you said, did you say what his  
 19 title was?  
 20 A. I didn't know his title. I don't know what  
 21 his title is now.  
 22 Q. Did you ever ask Mr. Jenne why he was  
 23 asking you questions about the Epstein case or  
 24 engaging you in a dialogue regarding the Epstein  
 25 cases?

1 BY MR. CRITTON:  
 2 Q. Did Mr., were you aware that Mr. Jenne was  
 3 attempting to shop the Epstein cases to investors  
 4 during the time you were at the RRA firm?  
 5 MR. SCAROLA: Objection, assumes facts.  
 6 THE WITNESS: No.  
 7 MR. SCAROLA: That's all right.  
 8 BY MR. CRITTON:  
 9 Q. Do you know Bill Scherer, Attorney Bill  
 10 Scherer?  
 11 A. No, I know of him.  
 12 Q. You are aware that he has a pending  
 13 lawsuit against various individuals including TD  
 14 Bank and other Defendants on behalf of various  
 15 investors; is that a fair statement?  
 16 A. I remember when that first came out. I have  
 17 not followed it. I don't know if it's active, if it's  
 18 still pending, or what the status is at all. But I do  
 19 remember a lawsuit being filed on behalf of somebody  
 20 against Scott Rothstein and others.  
 21 Q. All right. And do you remember, it's  
 22 within Paragraph 20 of the complaint it's a --  
 23 A. Of?  
 24 Q. Of, I'm sorry, of Exhibit No. 2. And it  
 25 states Fort Lauderdale attorney William Scherer

1 represents multiple Rothstein related investors. He  
2 indicated in an article that RRA, slash, Rothstein  
3 had used the Epstein ploy as a showpiece, as a  
4 showpiece, as bait. That's, and the quote is,  
5 Epstein ploy, as a showpiece, as bait. That's the  
6 way he raised all the money.

7 He would use cases as bait for luring  
8 investors into fictional cases. All the cases he  
9 allegedly structured were fictional. I don't  
10 believe there was a real one there.

11 Okay. If I asked you to assume that that  
12 quote is accurate from Mr. Scherer, would it be a  
13 correct, would it be a correct statement -- well,  
14 let me strike that.

15 Were you aware that Rothstein and other  
16 individuals were using the Epstein ploy; that is,  
17 the Epstein cases in order to, as bait in order to  
18 raise money for, for the firm and Mr. Rothstein?

19 MR. SCAROLA: I am going to object to the  
20 form of the question, but you can certainly  
21 answer it.

22 THE WITNESS: Okay. I am going to answer  
23 it to the extent that I understand it. No, I  
24 was not aware that the Epstein cases were being  
25 used as a showpiece, as bait. But you are also

1 A. No.

2 Q. Okay. Were you aware that Scott Rothstein  
3 had represented to other individuals that he had  
4 multiple other cases, multiple other Jane Doe's  
5 which he was trying to market to investors?

6 A. No.

7 Q. Were you aware that -- do you have any  
8 knowledge that Ken -- let me strike that.

9 Were you aware that Ken Jenne was  
10 attempting to market or shop non-existent Epstein  
11 cases to investors?

12 A. I wasn't aware then nor am I aware of that  
13 now, so, no.

14 Q. Do you have any knowledge that Mr. Fisten  
15 and/or Mr. Jenne would cart boxes of Epstein related  
16 materials; that is, existing Epstein related  
17 materials relating to Jane Doe and show those to  
18 other investors?

19 A. Do I have knowledge that somebody carted?

20 Q. Yeah, are you aware that Mr. Fisten or do  
21 you have any knowledge that Mr. Fisten brought boxes  
22 of Epstein-related materials to show perspective  
23 investors?

24 A. No.

25 MR. SCAROLA: Objection, assumes, Assumes

1 asked me to assume that the statement that you  
2 have injected as Paragraph 20 of the complaint  
3 is true and it begins with, or ends with I  
4 don't believe there was a real one in there,  
5 talks, speaking as to all the cases. And you  
6 know and I know that that statement is  
7 absolutely false in that you know each and  
8 every one of the claims that have been asserted  
9 against Mr. Epstein related to his molestation  
10 of children, they are all true including the  
11 three that I have against Mr. Epstein.

12 So, if you're asking me to assume that  
13 this is it true, no, I did not know that they  
14 were being used for anything.

15 BY MR. CRITTON:

16 Q. Okay. Well, as to whether Mr. Scherer was  
17 aware as to whether there were three pending cases  
18 or he assumed that they were all just made-up cases,  
19 neither you nor I know what he was thinking,  
20 correct?

21 A. Yeah, I don't know.

22 Q. All right. With regard to the Epstein  
23 ploy, with regard to Epstein cases, were you aware  
24 that Scott Rothstein was trying to market Epstein  
25 cases; that is, three, three cases that existed?

1 facts not in evidence, no proper predicate.

2 BY MR. CRITTON:

3 Q. Do you have any knowledge that Mr. Jenne  
4 either directly or directed someone else to bring  
5 boxes of Epstein-related materials to show  
6 investors?

7 MR. SCAROLA: Objection, assumes facts not  
8 in evidence, no proper predicate.

9 THE WITNESS: No.

10 BY MR. CRITTON:

11 Q. If, based on your earlier testimony, if  
12 there were boxes of Epstein materials on existing  
13 cases, Jane Doe, [REDACTED], and [REDACTED], again if I  
14 understood your testimony, that information would  
15 have been available someplace in the firm and  
16 someone who had access to the room could have  
17 grabbed those files or taken those files and done  
18 whatever they wanted to them, with them, and then  
19 brought them back for storage, correct, and you  
20 wouldn't know?

21 A. As is the case with every case in every law  
22 firm in America, yes.

23 Q. With regard to the three cases that you  
24 have now, does any law firm other than your current  
25 firm, which is Farmer, Jaffe?

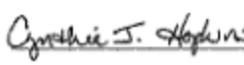
1 A. Weissing.  
 2 Q. Or RRA, Mr. Howell, or Mr. Cassell have  
 3 any interest in those cases?  
 4 A. No.  
 5 Q. At any time -- let me strike that. You  
 6 are aware that Mr. Alfredo Garcia has pled guilty to  
 7 an obstruction of justice charge based on the news?  
 8 A. I don't know Alfredo Garcia at all.  
 9 Q. Sorry about that. The head of Alfredo  
 10 Garcia. With regard Mr. Rodriguez, Alfredo  
 11 Rodriguez, are you aware through news reports that  
 12 he pled guilty to obstruction of justice?  
 13 A. Yes.  
 14 Q. At any time have you been given access to  
 15 the pamphlet book and/or any of the yellow pages  
 16 that have been referenced in the criminal  
 17 indictment?  
 18 MR. SCAROLA: I am going to instruct you  
 19 not answer that question on the basis of  
 20 attorney-client and work-product privilege.  
 21 BY MR. CRITTON:  
 22 Q. Has the, have you been, have you had any  
 23 contact with the criminal defense lawyer for  
 24 Mr. Rodriguez?  
 25 MR. SCAROLA: You can answer yes or no.

1 the information that is held by the FBI which would  
 2 include the pamphlet and the yellow, the pamphlet  
 3 and the yellow pages, true?  
 4 A. I have. Adam Horowitz has, and I may or may  
 5 not have piggybacked his motion. But as sitting here  
 6 right now, I, I don't remember drafting that motion.  
 7 Q. Are you sure he hasn't piggybacked your  
 8 motion?  
 9 A. I'm not sure. If you show me my motion, I can  
 10 tell you whether I drafted it or not.  
 11 Q. Have you --  
 12 A. That, that was certainly an idea.  
 13 Q. Have, have you also -- you have also  
 14 served a motion to obtain FBI files that relate to  
 15 Mr. Epstein; is that correct?  
 16 A. Correct.  
 17 Q. Okay. Have you spoken as a result of the  
 18 motion that you filed, has the government, have you  
 19 spoken with the United States Attorney's Office or  
 20 representatives for the FBI with regard to the  
 21 motion which you filed?  
 22 MR. SCAROLA: Objection, privilege and  
 23 instruct you not to answer.  
 24 BY MR. CRITTON:  
 25 Q. Have you received any type of response

1 THE WITNESS: No.  
 2 BY MR. CRITTON:  
 3 Q. Have you had any communication, not a  
 4 conversation but any communication with the criminal  
 5 defense lawyer about obtaining a copy of the  
 6 pamphlet and/or the pamphlet book or the yellow  
 7 pages that are referenced in the criminal indictment  
 8 that were at one time in the possession of Mr.  
 9 Rodriguez and that he apparently was trying to sell  
 10 to the cooperating witness?  
 11 MR. SCAROLA: I am going to instruct you  
 12 not to answer any question about anything that  
 13 you may have done in connection with the  
 14 fulfillment of your responsibilities as counsel  
 15 for the Plaintiffs in the three pending cases.  
 16 BY MR. CRITTON:  
 17 Q. Again, of course you're going to continue  
 18 to follow Mr. Scarola's direction?  
 19 A. On what I have done or what I have not done,  
 20 all of that is work-product.  
 21 Q. Well, you have filed a motion to obtain a  
 22 copy of the pamphlet book and the yellow pages of  
 23 Mr. Rodriguez, correct? I am sorry, either a  
 24 motion -- well, strike that. You have filed a  
 25 motion in federal court to obtain a copy of the, of

1 from the United States Attorney's Office or the FBI  
 2 with regard to the motion that you have filed?  
 3 MR. SCAROLA: You may answer that only  
 4 with respect to those matters that are matters  
 5 of public record; that is, if a response has  
 6 been filed with the court or provided to you in  
 7 the form of a pleading, you may respond.  
 8 THE WITNESS: I cannot respond to that  
 9 question.  
 10 MR. CRITTON: All right. We're going to  
 11 quit at 5. I don't want to go on.  
 12 MR. SCAROLA: You already, you already  
 13 missed that.  
 14 MR. CRITTON: All right. Well, let's,  
 15 I'll adjourn the deposition today, and I will  
 16 arrange with you for a time to finish.  
 17 MR. SCAROLA: Well, so that the record is  
 18 clear, it is our position that you have had  
 19 more than adequate time to conduct an  
 20 appropriate examination of Mr. Edwards, and we  
 21 will resist any further effort to depose him.  
 22 MR. CRITTON: I understand your position.  
 23 Disagree with it but understand it.  
 24 MR. SCAROLA: Thank you.  
 25 THE VIDEOGRAPHER: This concludes today's

1 videotape deposition of Scott Rothstein. The  
 2 time is --  
 3 THE WITNESS: Whoa, whoa.  
 4 THE COURT REPORTER: Yes. Bradley  
 5 Edwards.  
 6 THE WITNESS: Please don't lump me in with  
 7 that guy, man.  
 8 MR. SCAROLA: This concludes the  
 9 deposition of Mr. Bradley Edwards.  
 10 THE VIDEOGRAPHER: Oh, I'm sorry. This  
 11 concludes the deposition of Mr. Bradley  
 12 Edwards. The time is 5:07 p.m.  
 13 (A discussion was held off the record.)  
 14 THE COURT REPORTER: Did you want to order  
 15 this?  
 16 MR. CRITTON: Ask me tomorrow.  
 17 MR. SCAROLA: I will take a copy of it.  
 18 Let's stay on the record. We don't need to be  
 19 on the video record but I want to make the  
 20 statement that we would consider it entirely  
 21 inappropriate for any portion of this  
 22 deposition to be used for any reason whatsoever  
 23 that is not directly connected with the  
 24 prosecution of the pending claim against  
 25 Mr. Edwards or the defense of the

1 CERTIFICATE OF OATH  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5  
 6 I, the undersigned authority, certify that  
 7 BRADLEY J. EDWARDS, ESQUIRE personally appeared  
 8 before me and was duly sworn on the 23rd day of  
 9 March, 2010.  
 10  
 11 Dated this 5th day of April, 2010.  
 12  
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 16    
 17 Cynthia Hopkins, RPR, FPR  
 18 Notary Public - State of Florida  
 19 My Commission Expires: February 25, 2011  
 20 My Commission No.: DD 643788  
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1 counterclaims. Thank you.  
 2 MR. CRITTON: Bye.  
 3 MR. SCAROLA: Bye.  
 4 (Witness excused.)  
 5 (Deposition was concluded.)  
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1 CERTIFICATE  
 2 THE STATE OF FLORIDA  
 3 COUNTY OF PALM BEACH  
 4  
 5 I, Cynthia Hopkins, Registered Professional  
 6 Reporter, Florida Professional Reporter and Notary  
 7 Public in and for the State of Florida at large, do  
 8 hereby certify that I was authorized to and did  
 9 report said deposition in stenotype; and that the  
 10 foregoing pages are a true and correct transcription  
 11 of my shorthand notes of said deposition.  
 12 I further certify that said deposition was  
 13 taken at the time and place hereinabove set forth  
 14 and that the taking of said deposition was commenced  
 15 and completed as hereinabove set out.  
 16  
 17 I further certify that I am not attorney or  
 18 counsel of any of the parties, nor am I a relative  
 19 or employee of any attorney or counsel of party  
 20 connected with the action, nor am I financially  
 21 interested in the action.  
 22  
 23 The foregoing certification of this transcript  
 24 does not apply to any reproduction of the same by  
 25 any means unless under the direct control and/or  
 direction of the certifying reporter.  
 Dated this 5th day of April, 2010.  
  
 Cynthia Hopkins, RPR, FPR

1 DATE: April 5th, 2010  
2 TO: BRADLEY J. EDWARDS, ESQUIRE  
3 o/o Jack Scandola, Esquire  
4 SCARCY DENNEY SCAROLA

5  
6 IN RE: Epstein vs. Rothstein  
7 CASE NO.: 50 2009CA040800XXXXMB AG

8 Please take notice that on Tuesday, the 23rd of  
9 March, 2010, you gave your deposition in the  
10 above-referred matter. At that time, you did not  
11 waive signature. It is now necessary that you sign  
12 your deposition.

13 As previously agreed to, the transcript will be  
14 furnished to you through your counsel. Please read  
15 the following instructions carefully:

16 At the end of the transcript you will find an  
17 errata sheet. As you read your deposition, any  
18 changes or corrections that you wish to make should  
19 be noted on the errata sheet, citing page and line  
20 number of said change. DO NOT write on the  
21 transcript itself. Once you have read the  
22 transcript and noted any changes, be sure to sign  
23 and date the errata sheet and return these pages to  
24 me.

25 If you do not read and sign the deposition  
within a reasonable time, the original, which has  
already been forwarded to the ordering attorney, may  
be filed with the Clerk of the Court. If you wish  
to waive your signature, sign your name in the blank  
at the bottom of this letter and return it to us.

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Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

BRADLEY J. EDWARDS, ESQUIRE

1 ERRATA SHEET  
2 IN RE: EPSTEIN VS. ROTHSTEIN  
3 CR: Cynthia Hopkins, RPR, FPR  
4 DEPOSITION OF: BRADLEY J. EDWARDS, ESQUIRE  
5 TAKEN: March 23, 2010  
6 JOB NO.: 1333  
7 DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE  
8 PAGE # LINE # CHANGE REASON  
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Please forward the original signed errata sheet to  
this office so that copies may be distributed to all  
parties.  
Under penalty of perjury, I declare that I have read  
my deposition and that it is true and correct  
subject to any changes in form or substance entered  
here.

DATE: \_\_\_\_\_

SIGNATURE OF  
DEPONENT: \_\_\_\_\_

CERTIFICATE

THE STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing  
deposition by me given, and that the statements  
contained herein are true and correct to the best of  
my knowledge and belief, with the exception of any  
corrections or notations made on the errata sheet,  
if one was executed.

Dated this \_\_\_\_ day of \_\_\_\_\_,  
2010.

BRADLEY J. EDWARDS, ESQUIRE  
Job #1333