

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

SCOTT ROTHSTEIN,
individually, BRADLEY J.
EDWARDS, individually,

Defendants/Counter-Plaintiff,
_____ /

EPSTEIN'S OBJECTIONS TO EDWARDS'S DEPOSITION DESIGNATIONS

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph M of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, hereby objects to certain portions of the following of Defendant/Counter-Plaintiff Bradley Edwards's deposition designations, and to save space is listing only the portions to which he does **not object**, as nearly all of the questioning directed to Mr. Epstein was unrelated to this case. The grounds for the objections are discussed fully below.

1. March 17, 2010 deposition of Jeffrey Epstein

Counsel does *not object* to the following, relevant portions of Epstein's first deposition:

Page 13; Lines 11-21

Page 23; Lines 4-19

Page 23; Lines 4-19
Page 25; Lines 9-25
Page 26; Lines 6-15
Page 28; Lines 14-25
Page 30; Lines 6-18
Page 33; Lines 1-3
Page 34; Lines 7-22
Page 36; Lines 10-25
Page 38; Lines 1-22
Page 48; Lines 13-25
Page 49; Lines 24-25
Page 50; Lines 1-4
Page 50; Lines 8-25
Page 52; Lines 10-
Page 59; Lines 11
Page 63; Lines 4-25
Page 90; Lines 10-15
Page 116; Lines 8-15
Page 120; Lines 16-24
Page 126; Lines 1-5

2. January 25, 2012 deposition of Jeffrey Epstein

Counsel does *not object* to the following, relevant portions of Epstein's second deposition:

Page 17; Lines 12-15
Page 19-20; Lines 16-25 and Lines 1-22
Page 21; Lines 1-6

Epstein objects to the use of any testimony contained in each of the afore-referenced depositions that is not listed above, as it is neither relevant to, nor directly related to, Edwards's causes of action for Abuse of Process and Malicious Prosecution. The non-listed testimony and questioning from these depositions is salacious and replete with inflammatory and unnecessary lines of questioning related to criminal investigations or charges related to Epstein. Allowing the jury to hear this irrelevant portion of the depositions is improper, as it is being offered as "relevant solely to prove bad character"

and would unduly inflame and prejudice the minds of the jury against Epstein. § 90.404(2) (a) FLA. STAT. (2013). Epstein further makes his objections to all of the non-listed Epstein deposition testimony on the following grounds: Relevance; Prejudice; Confusion; Misleading; Impermissible/Inadmissible Character Evidence; Impermissible/Inadmissible Evidence of other Crimes, Wrongs, or Acts; and Attorney-Client Privilege. *See* § 90.403 FLA. STAT. (2013); § 90.502 FLA. STAT. (2013); § 90.404(2) (a) FLA. STAT. (2013).

By listing these grounds for objection, Epstein is not waiving his right to assert additional objections, or objections at trial.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this October 14, 2013.

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