

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

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

**MOTION TO CONTINUE HEARING SCHEDULED FOR OCTOBER 3, 2017
AND/OR EXTEND TIME TO FILE MOTIONS RELATED TO COLLATERAL
QUASI-CRIMINAL CASES**

Comes now the Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, by and through his undersigned attorney and moves this Honorable Court to continue and/or extend time to file motions, including a Motion to Stay in this case because of the impact this case has on related quasi-criminal proceedings. In support thereof Plaintiff/Counter-Defendant, JEFFREY EPSTEIN states as follows:

1. Undersigned counsel for the Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, has been Mr. Epstein's primary defense counsel for ten years.

2. Pending in the United States District Court for the Southern District of Florida is a quasi-criminal matter Doe v. United States, Case No. 08-cv-80736-KAM.

3. In that quasi-criminal matter the attorney, **Bradley J. Edwards**, who is pursuing the instant claim against Mr. Epstein is also pursuing an effort to invalidate Mr. Epstein's Non-Prosecution Agreement and to subject Mr. Epstein to potential criminal prosecution.

4. At a hearing before this Court on September 15, 2017, while undersigned counsel was on vacation out of the country, this Honorable Court set hearings for October 3, 2017 and established a briefing schedule requiring motions to be filed by September 25, 2017.

5. Undersigned counsel is solely responsible for criminal and quasi-criminal matters related to representation of Mr. Epstein. Because undersigned counsel for Mr. Epstein was out of the country at the time of the September 15, 2017 hearing and because communication with his office was limited at best due to the hurricane related closures, undersigned counsel was not able to communicate with his office prior to the September 15, 2017 hearing.

6. There is in draft form and currently being finalized, a Motion before this Court to stay the instant proceedings based on the fact that in the defense hereof, Mr. Epstein would be forced to invoke his Fifth Amendment privileges given Mr. Edwards attempts to invalidate his Non-Prosecution Agreement in the quasi-criminal matter, while at the same time attempting to include as evidence in the instant proceedings information and testimony regarding the quasi-criminal matter. Mr. Epstein's counsel has filed motions in limine to address Mr. Edwards' attempts to contaminate the instant proceedings with such matters, which we maintain should not be permitted.

7. The Motion to Stay is involved and requires annotations to other cases involving Mr. Epstein and Mr. Edwards. It cannot be completed prior to the September 25, 2017 date set by the court.

8. A logical sequence in addressing the motions that are pending, as well as the Motion to Stay would suggest that the Motion to Stay be heard first before any other motions are heard.

WHEREFORE, the Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, moves this Honorable Court to enter an Order continuing the hearings presently scheduled for October 3, 2017, and to extend the time for undersigned counsel to file Plaintiff/Counter-Defendant's Motion to Stay.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to all counsel on the attached service list by E-Service on September 25, 2017.

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