

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

REQUEST TO PRODUCE TO JEFFREY EPSTEIN

Bradley J. Edwards by and through his undersigned counsel, request, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Jeffrey Epstein, produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

1. Paragraph 12 of Edwards' Third Amended Counterclaim alleges that "Epstein ignored the statutory requirement for written notice prior to the initiation of a civil theft claim" against Edwards. That allegation is denied by Epstein.

Produce any and all documents* which you contend constitute any notice to Edwards of the intent to file a claim for violation of Chapter 772, Florida Statutes, and all documents* referring to the delivery to Edwards or any agent of Edwards of such notice.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form.

Edwards adv. Epstein
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“Documents” also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

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

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic and U.S. Mail to all Counsel on the attached list, this 18th day of June, 2012.



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