

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,

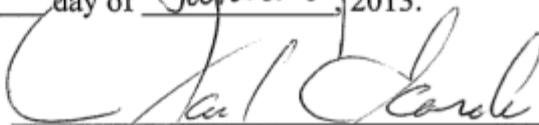
Defendant(s).

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**MOTION TO COMPEL DISCOVERY**

Counterclaimant, BRADLEY J. EDWARDS, moves this Honorable Court to compel timely responses to his financial discovery requests and in support would show that the Counterdefendant, through counsel, in the email attached has expressed an intention to delay the provision of responses beyond the time provided by the applicable Rules of Civil Procedure.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 10<sup>th</sup> day of January, 2013.



Jack Scarola

Florida Bar No.: 169440

Primary E-mail: [REDACTED]

Secondary E-mail(s): [REDACTED]

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: [REDACTED]

Fax: [REDACTED]

Attorney for BRADLEY J. EDWARDS

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Pho [REDACTED]  
Fax [REDACTED]  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire

[REDACTED]  
Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, FL  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phon [REDACTED]  
Fax: [REDACTED]

Fred Haddad, Esquire

[REDACTED]  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Pho [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire

[REDACTED]  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Pho [REDACTED]  
Fax [REDACTED]  
Attorneys for Scott Rothstein

Lilly Ann Sanchez, Esquire

[REDACTED]  
The L-S Law Firm  
1441 Brickell Avenue, 15th Floor  
Miami, FL 33131  
Pho [REDACTED]  
Fax [REDACTED]  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire

[REDACTED]  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Pho [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

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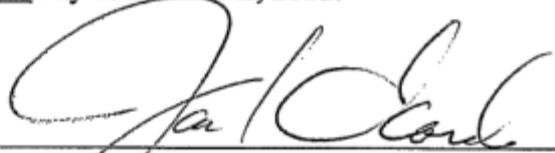
Defendant(s).

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**NOTICE OF SERVICE OF INTERROGATORIES TO COUNTERDEFENDANT**

Counterplaintiff, Bradley J. Edwards, hereby gives notice that pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, that Net Worth Interrogatories numbered 1 through 13 have been directed to Counterdefendant, JEFFREY EPSTEIN, this 21<sup>st</sup> day of December, 2012.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 21<sup>st</sup> day of December, 2012.



Jack Scarola  
Florida Bar No.: 169440  
Primary E-mail: [REDACTED]  
Secondary E-mail(s): [REDACTED]  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorney for Bradley J. Edwards

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire

[REDACTED]  
Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, FL  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]

Fred Haddad, Esquire

[REDACTED]  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire

[REDACTED]  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Scott Rothstein

Lilly Ann Sanchez, Esquire

[REDACTED] m  
The L-S Law Firm  
1441 Brickell Avenue, 15th Floor  
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Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire

[REDACTED]  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

**NET WORTH INTERROGATORIES TO JEFFREY EPSTEIN**

1. What is your full name?

2. How are you currently employed?

3. State the amount of your current annual income from all sources for each of the past 3 years and describe all additional benefits received by you or payable to you for each of the past 3 years including bonuses, allowances, pension and profit sharing participations, stock options, deferred compensation, insurance benefits and other prerequisites of your employment including the dollar amount or dollar value of each.

4. If you own or have any beneficial interest in any stocks, bonds, mutual funds, or other securities of any class in any government, governmental organization, company, firm or corporation, whether foreign or domestic, please state:

(a) The name and address of the entity in which you own or have any beneficial property or security interest of any sort;





- (g) The name and address of each real estate agent with whom the property has been listed for sale since the time of purchase;
  
- (h) The cost of any improvements made to the property since purchase;
  
- (i) The nature of your interest in the property.
  
- (j) The current fair market value of the property and a description of the manner in which that value was calculated

7. List each item and state the estimated value of all personal tangible, and intangible property in which you have an interest which personal property was acquired at a cost in excess of \$10,000 or which personal property has an estimated present value in excess of \$10,000, and as to each state:

- (a) The date of acquisition;

- (b) The cost of acquisition;
- (c) The current estimated fair market value;
- (d) The manner in which the fair market value was estimated.

8. If any of the real or personal property owned by you, either individually, jointly or otherwise, is encumbered by either a real estate mortgage, chattel mortgage, or any other type of lien, then for each item of property, state a description of the nature and amount of the encumbrance, the date the encumbrance arose, whether the encumbrance is evidenced by any written document and, if so, a description of that document.

9. If you have an ownership interest in any businesses, for each business state:



11. Identify all other assets of a value in excess of \$10,000 which assets were not previously identified and as to each state:

(a) The date of acquisition;

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(b) The cost of acquisition;

(c) The current estimated fair market value;

(d) The means utilized to estimate the current fair market value.

EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

12. Identify all other liabilities of an amount in excess of \$10,000 not previously identified and as to each state:

(a) The date the liability arose;

(b) The amount of the liability at inception;

(c) The terms of repayment or satisfaction;

(d) The current outstanding balance.

13. As to any calculation or estimate of your net worth at any time in the five years immediately preceding your receipt of these interrogatories, state:

- (a) the date of the calculation or estimate;
- (b) the name and address of the person or entity responsible for performing the work
- (c) the reason for performing the calculation or estimate;
- (d) the amount of net worth calculated or estimated

14. What is your present net worth?

15. As to all transfers of anything of a value in excess of \$10,000 made by you or on your behalf within the past 5 years, state:

- (a) a description of the transferred property;
- (b) the reason for the transfer;
- (c) the value of the item(s) transferred at the time of transfer;
- (d) the date and cost of your acquisition of the item(s);

EDWARDS ADV. EPSTEIN  
Case No.: 502009CA040800XXXXMBAG

(e) whether you received anything of value in exchange for the transferred item(s) and, if so, a description of what you received and the dollar value of what you received;

(f) the name and address of the recipient of each transferred item

STATE OF \_\_\_\_\_ )

COUNTY OF \_\_\_\_\_ )

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by \_\_\_\_\_, who is personally known to me or who has produced \_\_\_\_\_ as identification and who did did/ not take an oath.

(SEAL)

\_\_\_\_\_  
(Notary signature)

\_\_\_\_\_  
(Notary name - print)  
NOTARY PUBLIC, State of Florida

\_\_\_\_\_  
(Serial number, if any)

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Plaintiff,

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

Defendant,

---

**REQUEST FOR PRODUCTION TO COUNTER-DEFENDANT**  
**(PUNITIVE DAMAGES)**

BRADLEY J. EDWARDS, by and through his undersigned counsel, and pursuant to Florida Rule of Civil Procedure 1.350, hereby requests Production from JEFFREY EPSTEIN of the documents and things described below for the purpose of inspection, copying, photographing, testing or sampling and any other purposes permitted under the Florida Rules of Civil Procedure at the office of the undersigned within thirty (30) days of service of this request.

**DEFINITIONS AND INSTRUCTIONS:**

A. The term "documents" as used in this Request is defined as including, but not limited to, the original and any non-identical copy (which is different from the original because of notations on such copy or otherwise) of all correspondence, telegrams, teletype messages, contracts (including drafts, proposals and any and all exhibits thereto), draft minutes and addenda, memoranda (including inter and intra office memoranda), memoranda for file, pencil jottings, diary entries, desk calendar entries, reported recollections and other written form of

notation of events or intentions, transcripts and recordings of conversations and telephone calls, books, records, photographs, reports, tabulations, charts, books of account, ledgers, invoices, financial statements, purchase orders, receipts, canceled checks and other documentary material not subject to attorney/client privilege, together with any documents thereto, or enclosures therewith. The term "document" shall include data stored, maintained or organized electronically or magnetically through computer equipment, translated, if necessary, by you into comprehensible form.

The term "document includes the complete file or files within which any items constituting a "document" are found, including all such files within your possession, custody or control wherever located, including any branch, local or main offices, and including not only the contents of such files but also the folder, jacket, envelope or other container in which the file is kept or stored.

Each draft, final document, original, reproduction, and each signed and unsigned document and every additional copy of such document where such copy contains any commentary, note, notation or other change whatsoever that does not appear on the original or on the copy of the one document produced shall be deemed and considered to constitute a separate document.

B. As used herein, the following words shall have the meanings indicated:

- (i) "Plaintiffs" in addition to the Plaintiffs named in the full style of this action, shall include any attorney, officer, director, employee or agent of

Plaintiffs or any other persons acting under Plaintiffs' control or supervision, or in concert or association with Plaintiffs.

- (ii) "Defendant", in addition to the Defendant named in the full style of this action, shall include any attorney, officer, director, employee or agent of the Defendant or any other persons acting under Defendant's control or supervision, or in concert or association with the Defendant.
- (iii) "You" shall include the person (as defined below) or party to whom this Request is addressed and additionally all of his/her/its agents, officers, directors, employees, and other persons acting or purporting to act on his/her/its behalf, and includes also, to the extent there is no actual privilege, his/her/its attorneys.
- (iv) "Person" means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments, and other units herein, and shall include, but not be limited to, public or private corporations, partnerships, joint ventures, voluntary or unincorporated associations, organizations, proprietorships, trusts, estates, governmental agencies, commissions, bureaus, or departments, and the agents, servants and employees of same.
- (v) "Concerning" includes referring to, responding to, relating to, connected with, regarding, discussing, analyzing, showing, describing, reflecting, employing and constituting.

- (vi) "Evidencing" means having a tendency to show, prove, or disprove.
- (vii) "Communication" means any oral or written statement, dialogue, colloquy, discussion or conversation, and also means any transfer of thoughts or ideas between persons by means of documents and includes any transfer of data from one location to another by electronic or similar means.
- (viii) "Including" shall mean including but not limited to.
- (ix) The words "and" and "or" as used herein shall be construed either disjunctively or conjunctively as required by the context to bring within the scope of this production request any answer that might be deemed outside its scope by another construction.
- (x) "Related to" or "relating to" shall mean directly or indirectly, refer to, reflect, describe, pertain to, arise out of or in connection with, or in any way legally, logically, or factually be connected with the matter discussed.

C. This Request calls for production of all responsive documents in your possession, custody or control without regard to physical location of said document.

Control means in your possession, custody or control or under your direction, and includes in the possession, custody or control of those under the direction of you and your employees, subordinates, counsel, accountant, consultant, expert, parent or affiliated corporation, and any person purporting to act on your behalf.

D. All documents shall be originals unless otherwise indicated. If your original is a photocopy or other copy, then the photocopy shall be produced as the original.

E. Unless another time period is specified, this Request is addressed to documents created in the past five years from the date of this Request, and ending on the date of compliance with this Request.

F. If you possess no documents responsive to a paragraph in this Request, state this fact, specifying the paragraph concerned.

G. If you object in part to any Request, produce the portion of the documents requested to which you do not object, and state your objections to the remainder.

H. As required by Florida Rule of Civil Procedure 1.280(b)(5), if you (including your attorneys and agents) are withholding information otherwise discoverable under these rules by claiming that it is privileged or subject to protection as trial preparation material, you (including your attorneys and agents):

(i) Shall make the claim expressly and shall describe the nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing the information itself privileged or protected, will enable the party seeking discovery through this Request to assess the applicability of the privilege or protection.

(ii) Provide a brief description of the document, including (a) the date of the document; (b) number of pages, attachments and appendices; (c) the names of its author, authors, preparers and an identification by employment and title of each

such person; (d) the name of each person who has sent, shown, or blind carbon copies of the documents, or has had access to or custody of the documents, together with an identification of each such person, and (e) in the case of any document relating or referring to a meeting or conversation, an identification of such meeting or conversation.

I. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope hereof any documents which might otherwise be construed to be outside the scope hereof.

#### **CONTINUING REQUEST**

This is a continuing request for the production of documents to the extent allowed by Florida Rule of Civil Procedure 1.280(e). At such time as you become aware of the existence of any additional documents responsive to this Request so that your response was not complete when made, you are hereby requested to produce such documents promptly.

#### **DESTROYED DOCUMENTS**

If any documents responsive to this Request were at one time in existence, but have been lost or destroyed, a list should be provided of the documents so lost or destroyed stating the following information for each such document: (a) the type of document; (b) the date on which it ceased to exist, (c) the circumstances of its loss or destruction; (d) the identity of all persons having knowledge; and (e) the identity of all persons having knowledge of its contents.

### **MANNER OF PRODUCTION**

Pursuant to Rule 1.350, you should produce the original documents in the form, order and manner in which they are maintained in your files or the files of other persons under your control. In this connection, and for purposes of illustration, documents are to be produced in the file folder and file cartons in which they have been maintained or stored, clipped, stapled or otherwise arranged in the same form and manner as they were found. In the alternative, you should segregate all documents according to the specifications of this Request, and should organize and label each group of documents with the appropriate specifications prior to production. If any document is responsive to more than one specification of this Request, it should be labeled to reflect each specification to which it is responsive.

### **REQUESTS FOR PRODUCTION**

1. Please produce all Financial Statements prepared for or submitted to any Lender or Investor for the past five (5) years by you personally or on your behalf or on behalf of any entity in which you hold a controlling interest.
2. Please produce the W-2's and any other documents reflecting any income (including salary, bonuses, dividends, profit distributions, and any other form of income), including all gross and net revenue received by you directly or indirectly for the past five (5) years.
3. All tax returns filed with any taxing entity during the past five (5) years by you or on your behalf, or on behalf of any entity in which you hold or held a controlling interest at the time of filing.

4. All bank statements or other financial statements which were prepared by or received by you, or on your behalf or by or on behalf of any entity in which you had an ownership interest of 10% or more at any time during the past five (5) years.

5. All financial statements which were prepared by you or on your behalf, or by or on behalf of any entity in which you held an ownership interest of 10% or more at any time during the past five (5) years.

6. The deeds and titles to all real property owned by you or held on your behalf either directly or indirectly at any time during the past five (5) years.

7. All passbooks with respect to all savings accounts, checking accounts and savings and loan association share accounts owned by your or on which you hold a right or have a held a right to withdraw funds at any time during the past five years.

8. All passbooks with respect to all savings accounts, checking accounts and savings loan association share accounts, owned by you in whole or in part jointly as co-partner, or joint venture, in any business enterprise, or owned by an entity in which you have or have had a controlling interest at any time during the past 5 years.

9. The most recent bank ledger sheets in your possession, or accessible by you on the internet, with respect to all bank accounts in which you have a right to withdraw funds.

10. The most recent bank ledger sheets in your possession, or accessible by you on the internet, with respect to all bank accounts owned by you solely, or jointly as co-partner, or joint venture, in any business enterprise, or owned by any entity in which you have a controlling interest.

11. All checkbooks for all accounts on which you were authorized to withdraw funds for the past five (5) years.

12. All corporate securities (stocks or bonds) owned by you, directly or indirectly.

13. The latest available balance sheets and other financial statements with respect to any and all business enterprises of whatever nature in which you possess any ownership interest of 10% or more, whether as partner, joint venture, stockholder, or otherwise.

14. Your accounts receivable ledger or other company records which sets forth the names and addresses of all persons or business enterprises that are indebted to you and the amounts and terms of such indebtedness.

15. Copies of the partnership or corporate Income Tax Returns for any partnership or corporation in which you do possess or have possessed any ownership interest of 10% or more whether as partner, joint venture, stockholder or otherwise, for the last five (5) years.

16. The title certificates, registration certificates, bills of sale, and other evidences of ownership possessed by you or held for your beneficial interest with respect to any of the following described property owned by you or held directly or indirectly for your beneficial interest:

- a. Motor vehicles of any type;
- b. Commercial, business or construction equipment of any type; and
- c. Boats, launches, cruisers, planes, or other vessels of any type.

17. All records pertaining to the transfer of any money or property interests or financial interests made by you in the past 5 years.

18. Any and all memoranda and/or bills evidencing the amount and terms of all of your current debts and obligations.

19. All records indicating any and all income and benefits received by you from any and all sources for the past 5 years.

20. Copies of any and all brokerage account statements or securities owned by you individually, jointly with any person or entity or as trustee, guardian or custodian, for the past 5 years, including in such records date of purchase and amounts paid for such securities, and certificates of any such securities.

21. All records pertaining to the acquisition, transfer and sale of all securities by you or on your behalf for the past 5 years, such records to include any and all information relative to gains or losses realized from transactions involving such securities.

22. All policies of insurance in which you or any entity controlled by you is the owner or beneficiary.

23. Copies of any and all trust agreements in which you are the settlor or beneficiary together with such documents necessary and sufficient to identify the nature and current value of the trust res.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAGr  
Request to produce to Jeffrey Epstein (Punitive Damages)  
Page 11 of 12

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 21<sup>st</sup> day of December, 2012.



---

JACK SCAROLA  
Florida Bar No.: 169440  
Primary E-mail: [REDACTED]  
Secondary E-mail(s) [REDACTED]  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorney for Bradley J. Edwards

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire

[REDACTED]  
Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, FL  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Fred Haddad, Esquire

[REDACTED]  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire

[REDACTED]  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Scott Rothstein

Lilly Ann Sanchez, Esquire

[REDACTED]  
The L-S Law Firm  
1441 Brickell Avenue, 15th Floor  
Miami, FL 33131  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire

[REDACTED]  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: [REDACTED]  
Fax: [REDACTED]  
Attorneys for Jeffrey Epstein

Mary E. Pirrotta

---

**From:** Jack Scarola  
**Sent:** January 10, 2013 11:59 AM  
**To:** Tonja Haddad Coleman  
**Cc:** Mary E. Pirrotta; Brad Edwards  
**Subject:** Re: EDWARDS ADV. EPSTEIN--

oCaseID: 10201635

I disagree with your positions on both our entitlement to a trial setting and the timing of our right to receive responses to our financial discovery requests. What day next week are you available to attend a UMC hearing addressing the latter issue?

On Jan 10, 2013, at 10:21 AM, "Mary E. Pirrotta" [REDACTED] wrote:

---

**From:** Tonja Haddad Coleman [mailto:[REDACTED]]  
**Sent:** January 10, 2013 9:51 AM  
**To:** Mary E. Pirrotta  
**Cc:** [REDACTED]  
**Subject:** Re: EDWARDS ADV. EPSTEIN--SERVICE OF COURT DOCUMENTS - 502009CA040800XXXMBAG (File #: 291874)

Mr. Scarola-

I believe even you would have to concede that we are entitled, and even required, to file a timely response to your fourth amended counterclaim. As such, the pleadings are not closed, and once they are the rules require a 20- day time parameter. As such, I respectfully suggest that you re-read the actual rule and act accordingly- as "your position" is in direct contravention therewith.

Because your financial worth discovery was served "pre-complaint" you will receive our responses/objections thereto in a timely manner.

You will have the other discovery response by the end of the day.

Tonja Haddad Coleman, Esq.  
315 SE 7th Street  
Fort Lauderdale, FL 33301  
[REDACTED]

Sent from my iPhone

On Jan 10, 2013, at 9:33 AM, "Mary E. Pirrotta" [REDACTED] wrote:

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**From:** Jack Scarola  
**Sent:** January 10, 2013 9:30 AM

**Subject:** Re: EDWARDS ADV. EPSTEIN--SERVICE OF COURT DOCUMENTS - 502009CA040800XXXXMBAG (File #: 291874)

Reply all-

Dear Mr. Haddad and Ms. Coleman:

It appears that Mr. Haddad may have inadvertently copied us on his message to Ms. Coleman. Nevertheless, I will respond to the substance of Ms. Coleman's email. The Fourth Amended Counterclaim was sent out simultaneously with the Notice for Trial, and I assume you now have it. You will note that the factual allegations of the amended pleading are absolutely identical in all respects to those of the Third Amended Counterclaim which has already been fully answered. The only difference between the two pleadings is the addition of the claim for punitive damages in the "Wherefore clause" as authorized by the trial court. Accordingly, it is our position that the case is at issue and has been at issue for months. We are entitled to a trial setting.

On an unrelated matter, we look forward to a timely response to our outstanding financial discovery requests and receipt by tomorrow of responses to our surveillance discovery.

Sincerely,  
Jack Scarola

Cc: Bradley Edwards, Esq.

---

**From:** Fred Haddad [mailto: [REDACTED]]  
**Sent:** January 10, 2013 8:55 AM  
**To:** Tonja Haddad Coleman  
**Cc:** Mary E. Pirrotta; [REDACTED]  
[REDACTED]  
[REDACTED] Debbie Fein; [REDACTED]  
**Subject:** Re: EDWARDS ADV. EPSTEIN--SERVICE OF COURT DOCUMENTS - 502009CA040800XXXXMBAG (File #: 291874)

Read it. Want to revise first paragraph to put court on notice of whsts doing

Sent from my iPhone

On Jan 9, 2013, at 3:43 PM, Tonja Haddad Coleman [REDACTED] wrote:

Mr. Scarola-

While I appreciate that you are ready for trial, the applicable Rule deems your Notice grossly premature, as we have yet to even receive your Amended Complaint including Punitive

Damages. Shall we move to strike it, yet again, or will you be withdrawing it?

Tonja Haddad Coleman, Esq.

**TONJA HADDAD, P.A.**

**Advocate Building**

**315 SE 7<sup>th</sup> Street**

**Fort Lauderdale, FL 33301**

[REDACTED] facsimile

The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

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**From:** Mary E. Pirrotta [mailto:[REDACTED]]  
**Sent:** Wednesday, January 09, 2013 3:35 PM  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED] Tonja Haddad Coleman; Debbie  
Fein; [REDACTED]  
**Subject:** EDWARDS ADV. EPSTEIN--SERVICE OF  
COURT DOCUMENTS - 502009CA040800XXXXMBAG (File  
#: 291874)

IN THE CIRCUIT COURT OF THE FIFTEENTH  
JUDICIAL CIRCUIT, IN AND FOR PALM  
BEACH COUNTY, FLORIDA  
502009CA040800XXXXMBAG  
JEFFREY EPSTEIN v. SCOTT ROTHSTEIN,  
individually, BRADLEY J. EDWARDS,  
individually, and L.M., individually  
Notice for Jury Trial (signed)  
Sent by: Jack Scarola [REDACTED]

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