

WEST PALM BEACH OFFICE:  
2139 PALM BEACH LAKES BLVD.  
WEST PALM BEACH, FLORIDA 33409

TALLAHASSEE OFFICE:

# SEARCY DENNEY SCAROLA BARNHART & SHIPLEY P.A.

*Attorneys  
at Law*

VIA FAX AND U.S. MAIL

March 11, 2011

Joseph [redacted]. Ackerman, Jr., Esquire  
Fowler White Burnett, P.A.

Re: Epstein v. Rothstein, et al  
Our File No.: 291874

Dear Mr. Ackerman:

Enclosed please find Edwards' Motion for Protective Order, together with a Notice of Hearing for March 30, 2011, at 8:45a.m. You have noticed the deposition of Herbert Stettin for Wednesday, March 16, 2011; however, due to the suspension of Judge Crow's UMC calendar, we are unable to have this matter heard before the deposition date. We ask that you postpone this deposition until our motion can be heard on March 30<sup>th</sup>.

If there is a possibility of resolving any of the issues raised in the motion without the necessity of court intervention, please call me.

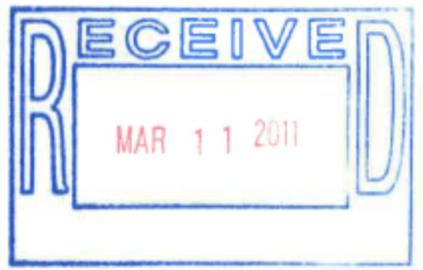
Since my schedule often makes it difficult to reach me by phone during regular business hours, I invite you, if necessary, to call me at home in the evening at [redacted]

Sincerely,



JACK SCAROLA  
JS/mep  
Enclosure  
cc: Bradley J. Edwards, Esq.

- ATTORNEYS AT LAW:
- \*ROBALYN BIA BAKER-BARNES
  - \*F. GREGORY BARNHART
  - T. HANDEE BASS, III
  - LAURIE J. BRIGGS
  - BRIAN P. DENNEY
  - \*EARL DENNEY, JR.
  - BRENDA S. FULMER
  - JAMES W. GUSTAFSON, JR.
  - JACK R. HILL
  - DAVID K. KELLEY, JR.
  - WILLIAM B. KING
  - DARRYL L. LEWIS
  - \*WILLIAM A. NORTON
  - PATRICK E. QUINLAN
  - EDWARD V. RICCI
  - \*DAVID J. SALES
  - \*JOHN SCAROLA
  - \*CHRISTIAN D. SEARCY
  - \*JOHN A. SHIPLEY III
  - CHRISTOPHER K. SPEED
  - BRIAN P. SULLIVAN
  - KAREN E. TERRY
  - \*C. CALVIN WARRINER III
- SHAREHOLDERS  
\*BOARD CERTIFIED
- ALSO ADMITTED:
- <sup>1</sup> KENTUCKY
  - <sup>2</sup> MAINE
  - <sup>3</sup> MARYLAND
  - <sup>4</sup> MASSACHUSETTS
  - <sup>5</sup> MISSISSIPPI
  - <sup>6</sup> NEW HAMPSHIRE
  - <sup>7</sup> NEW YORK
  - <sup>8</sup> WASHINGTON DC
- PARALEGALS:
- VIVIAN AYAN-TEJEDA
  - ALYSSA A. DIEDWARDO
  - RANDY M. DUPRESNE
  - DAVID W. GILMORE
  - JOHN C. HOPKINS
  - DEEON H. M. KNAPP
  - VINCENT I. LEONARD, JR.
  - JAMES PETER LOVE
  - CHRISTOPHER J. PILGO
  - ROBERT W. FITCHER
  - MARK R. PONCY
  - KATHLEEN SIMON
  - STEVE M. SMITH
  - RONNIE S. STARK
  - WALTER A. STEIN



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  
[REDACTED], individually,

Defendant(s).

**NOTICE OF HEARING**

**YOU ARE HEREBY NOTIFIED** that the undersigned has called up for hearing the following:

**DATE:** Tuesday, March 30, 2011

**TIME:** 8:45 a.m.

**JUDGE:** Honorable David F. Crow (Palm Beach County Courthouse)

**PLACE:** [REDACTED]

**ROOM #:** 9-C

**SPECIFIC MATTERS TO BE HEARD:**

Motion for Protective Order (Deposition of Herbert Stettin)

Moving counsel certifies that he or she contacted opposing counsel and attempted to resolve the discovery dispute without hearing.

Case No.: 502009CA040800XXXXMBAG  
Notice of Hearing

**\*In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding, contact the Court Administrator's office not later than seven (7) days prior to the proceedings. If hearing impaired, contact (TDD)**

[REDACTED]

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 11<sup>th</sup> day of March, 2011.

  
JACK SCAROLA

[REDACTED]  
Searcy Denney Scarola Barnhart & Shibley

[REDACTED]

Attorney for Bradley J. Edwards

Case No.: 502009CA040800XXXXMBAG  
Notice of Hearing

COUNSEL LIST

Jack A. Goldberger, Esquire  
Atterbury, Goldberger & Weiss, P.A.



Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, PL



Joseph [REDACTED], Ackerman, Jr., Esquire  
Fowler White Burnett, P.A.



Marc S. Nurik, Esquire  
Law Offices of Marc S. Nurik



#291874/mep

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

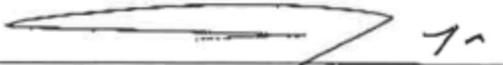
SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually, and  
[REDACTED].M., individually,

Defendant(s).

MOTION FOR PROTECTIVE ORDER

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for the entry of a protective order with respect to discovery sought pursuant to the attached Notice and in support would show that the document production described in the Notice is not reasonably calculated to lead to the discovery of admissible evidence and unreasonably invades the privacy rights of third-parties.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 11<sup>th</sup> day of March, 2011.

  
\_\_\_\_\_  
Jack Scarola  
Florida Bar No.: 169440  
Searcy Denney Scarola Barnhart & Shinley

[REDACTED]  
Attorney for Bradley J. Edwards

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Edwards' Motion for Protective Order (Stettin)

COUNSEL LIST

Jack A. Goldberger, Esquire  
Atterbury, Goldberger & Weiss, P.A.



Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, PL



Marc S. Nurik  
Law Offices of Marc S. Nurik



Joseph [REDACTED] Ackerman, Jr., Esquire  
Fowler White Burnett, P.A.



IN THE CIRCUIT COURT OF THE  
15th JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY,  
FLORIDA

JEFFREY EPSTEIN,

Plaintiff,

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually, BRADLEY J.  
EDWARDS, individually, and [REDACTED], individually,

Defendants.

**NOTICE OF TAKING DEPOSITION- DUCES TECUM\***

PLEASE TAKE NOTICE that the undersigned attorney or an attorney of the firm will take the deposition of the following deponent and this deponent is to bring with him the following records on attached Duces Tecum on Schedule "A"

**Name:** Records Custodian,  
Herbert Stettin, Trustee in Bankruptcy for RRA

**Date and Time:** Wednesday, March 16, 2011 at 11:00 a.m.

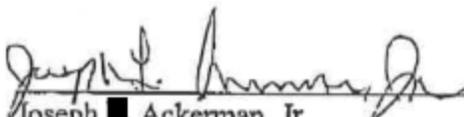
**Place:** Fowler White Burnett, P.A.  
Espirito Santo Plaza  
[REDACTED]

Upon oral examination before ORANGE COURT REPORTING, Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for the use at trial, or for such other purposes as are permitted under the rules of the Court.

Case No. 50 2009CA040800XXXXMB AG  
Epstein v Rothstein/Edwards  
NTD-DT RC/Herb Stettin, Trustee  
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I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed and mailed this 4<sup>th</sup> day of March, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley, Attorneys for Bradley J. Edwards, [REDACTED] and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, [REDACTED]

Respectfully submitted,



Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954  
Christopher E. Knight  
Fla. Bar No. 607363

FOWLER WHITE BURNETT P.A.

[REDACTED]

cc: Orange Court Reporting  
[REDACTED]

cc: Charles Lichtman, Esquire (w/enclosures)

Case No. 50 2009CA040800XXXXMB AG  
Epstein v Rothstein/Edwards  
NTD-DT RC/Herb Stettin, Trustee  
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**EPSTEIN v ROTHSTEIN, EDWARDS**

**SCHEDULE "A"**

**DUCES TECUM/Herb Stettin, Trustee RRA/RC Deposition:**

Any and all employment records for the following employees at Rothstein, Rosenfeldt, Adler, P.A. ("RRA"), that shows her full name, residence address, telephone, social security number, date of birth, application for employment at RRA, I-9 forms, W-4 forms, application(s) for insurance benefits, payroll records and pay stubs, all references/emergency contacts which will include names, addresses and telephone numbers and drivers license information and a photocopy of any documents RRA took a photocopy of with picture ID on the following:

1. Cara [REDACTED] Holmes
2. Jacqui Johnson
3. Mercedes Estrada
4. Elizabeth Kim
5. Christina Fitch
6. Carl Linder
7. Jonathan Birkman
8. Rob Buschel