

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).

MOTION FOR PROTECTIVE ORDER

Interested Person, ELIZABETH KIM, by and through undersigned, 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 15th day of March, 2011.

FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, PL
Attorneys for Plaintiff(s)
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Fl 33301



BY: 
Bradley J. Edwards
Florida Bar No. 
Attorney for Christina Fitch

COUNSEL LIST

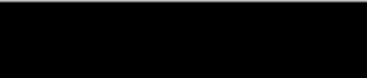
Jack A. Goldberger, Esquire
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West Palm Beach, FL 33401



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

JEFFREY EPSTEIN,

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

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

SUBPOENA FOR DEPOSITION DUCES TECUM

THE STATE OF FLORIDA:

TO: Records Custodian,
Herb Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt & Adler, P.A.
c/o James C. Cunningham, Jr.
Berger & Singerman, P.A.
200 South Biscayne Boulevard, Suite 1000
Miami, FL 33131

3-3-11 3:00
JCL

YOU ARE COMMANDED to appear before a person authorized by law to take depositions at the law offices of Fowler White Burnett, P.A., Espirto Santa Plaza, 1395 Brickell Avenue, 14th Floor, Miami, FL 33131 on **Wednesday, March 16, 2011, at 11:00 a.m.**, for the taking of your deposition in this action and to have with you at that time and place the following:

See Attached Schedule "A"

If you fail to appear, you may be in contempt of court.

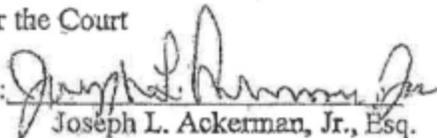
Epstein v Rothstein/Edwards
Case No. 502009CA040800XXXXMBAG
Subpoena DT/Herb Stettin, Trustee RRR/RC

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated on March 4, 2011.

For the Court

By:



Joseph L. Ackerman, Jr., Esq.

FBN. 295354

Christopher E. Knight, Esq.

FBN. [REDACTED]

Joseph L. Ackerman, Jr., Esq.
Lilly Ann Sanchez, Esq.
Fowler White & Burnett, P.A.
Attorneys for Plaintiff, Jeffrey Epstein
Espirto Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, FL 33131



Epstein v Rothstein/Edwards
Case No. 502009CA040800XXXXMBAG
Subpoena DT/Herb Stettin, Trustee RRR/RC

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 L. Holmes
2. Jacqui Johnson
3. Mercedes Estrada
4. Elizabeth Kim
5. Christina Fitch
6. Carl Linder
7. Jonathan Birkman
8. Rob Buschel