

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

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**RESPONSE IN OPPOSITION TO PLAINTIFF/COUNTER-DEFENDANT  
JEFFREY EPSTEIN'S MOTION FOR TEMPORARY STAY OF PROCEEDINGS**

Defendant/Counter-Plaintiff Bradley J. Edwards, by and through undersigned counsel, hereby submits this Response in Opposition to Plaintiff/Counter-Defendant Jeffrey Epstein's Motion for Temporary Stay of Proceedings, and as grounds therefor states as follows:

**Summary**

Jeffrey Epstein initiated this litigation in 2009. For three years, he carried the burden of proof to establish that Bradley Edwards had fabricated his clients' sexual assault claims against Epstein, in furtherance of a Ponzi scheme. Substantial discovery was taken by both parties. In 2012, Epstein voluntarily dismissed his complaint, and the sole remaining claim became Mr. Edwards' counterclaim for malicious prosecution. For the next five years, the parties litigated Mr. Edwards' claims in both the trial and appellate courts and continued to take substantial discovery on the issues raised.

Now, facing a special set trial date in early December, Epstein makes an eleventh-hour request for an indefinite "stay" of these proceedings. Given that trial is less than two (2) months

away, and that the vast majority of discovery and motion practice has already been conducted over the last eight (8) years, a stay is not what Epstein is seeking. What Epstein really wants is a continuance of the upcoming jury trial on the merits. For the reasons stated below, however, no such continuance is warranted, and the Court should deny Epstein's incorrectly-titled and ill-fated motion.

### **Procedural History**

A. In 2009, Epstein Voluntarily Initiated this Lawsuit Despite Full Knowledge of the prior-filed *Doe v. United States* Victim's Rights Act Case.

On July 7, 2008, *Doe v. United States*, case no. 08-cv-80736-KAM, a Crime Victims' Rights Act case, was filed on behalf of Jane Doe, who was sexually assaulted by Jeffrey Epstein when she was a minor child. Four days later, Jane Doe filed her Reply to the Government's response to the *Doe* petition, confirming her belief that Epstein's non-prosecution agreement ("NPA") should be declared illegal and that the Federal Court should "direct the Government to proceed to negotiate a new agreement – in a process that respects Petitioner's (and the other victims') rights."<sup>1</sup>

On December 7, 2009, after being aware for seventeen (17) months that the purpose of the *Doe* case was to invalidate his Non-Prosecution Agreement, Epstein nonetheless voluntarily initiated this civil proceeding, alleging that Mr. Edwards had fabricated certain civil claims arising from Epstein's systematic sexual abuse of minor female children as part of a fraudulent Ponzi

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<sup>1</sup> See Epstein's Motion for Temporary Stay at 2-3 (citing to the July 11, 2008 Reply). Mr. Edwards respectfully requests that the Court take judicial notice of the *Doe* docket pursuant to Fla. Stat. § 90.202(6).

scheme that Mr. Edwards was allegedly running with Scott Rothstein and one of Edwards' clients, L.M. In his initial complaint, Epstein emphatically stated that "[t]his lawsuit is filed and *will be vigorously pursued* against all these defendants." See Epstein's Initial Complaint at 'Summary'. (Emphasis added). **In accordance with this representation to the Court, Epstein made no attempt to stay his newly-filed civil case pending the resolution of the *Doe* Victim's Rights Act proceeding.**

On April 12, 2011, Epstein filed his Amended Complaint against Mr. Edwards, in which he expressly addressed the ongoing *Doe* proceeding. Specifically, Epstein alleged in paragraph 29(4) of his Amended Complaint:

. . . Instead, the purpose of requesting those records was to obtain them for use in a separately filed Crime Victims' Rights Act ("CVRA") suit, *Jane Doe 1 and Jane Doe 2*, Case No. 08-80736-CIV, Marra/Johnson which was brought for several purposes, *including invalidating the [Non-Prosecution] Agreement* . . .

(Emphasis added). **Despite now expressly acknowledging to the Court that his NPA could be invalidated, Epstein still made no attempt to stay the civil case pending a resolution of *Doe*.**

On September 2, 2011, Epstein moved to intervene on a limited basis in *Doe*, thereby inserting himself into that Victim's Rights Act proceeding. *See Doe v. United States*, case no. 08-cv-80736-KAM (Dkt. No. 93). One month later, on October 4, 2011, Mr. Edwards filed his Amended Counterclaim in this civil action, asserting a claim for malicious prosecution and alleging that Epstein had no basis to initiate this suit in the first place. The allegations against Epstein were true, and the horrific nature of Epstein's conduct against Mr. Edwards' clients

obviated any need for Mr. Edwards to exaggerate his clients' claims. **Once again, however, Epstein made no attempt to stay this case pending resolution of *Doe*.**

On August 16, 2012, on the eve of a scheduled summary judgment hearing on the validity of Epstein's underlying claims, Epstein dismissed his remaining claims against Mr. Edwards without having made any attempt to defend against the motion for summary judgment. Although the only remaining claim was Mr. Edwards' counterclaim for malicious prosecution, **Epstein again made no attempt to stay Mr. Edwards' counterclaim pending resolution of the *Doe* matter.**

On December 18, 2012, the Court entered its Order on Counter-Plaintiff Edwards' Renewed Motion for Leave to Assert Claim for Punitive Damages, in which the Court permitted Mr. Edwards to amend his counterclaim to seek punitive damages against Epstein. By this Order, Epstein's personal financial information was now directly at issue in this case. **Yet Epstein still did not seek a stay pending resolution of the *Doe* matter.**

For the next five (5) years, the parties engaged in vigorous litigation at both the trial and appellate levels concerning Mr. Edwards' claim for malicious prosecution. Substantial discovery was taken. At the same time, the *Doe* proceeding continued before the Federal Court, as Epstein's victims sought to protect their statutory rights under the Crime Victims' Rights Act, 18 U.S.C. § 3771. The *Doe* docket reveals that Epstein continued to be involved in that proceeding, and was even a limited participant in at least one settlement conference between the parties in 2016. See, e.g., Dkt. No. 391 (permitting Epstein's counsel to be "present for the joint opening session, after

which his counsel may remain in the courthouse on standby and subject to limited participation if deemed appropriate by the Court during the course of settlement negotiations.”). **Consistent with every action he had taken since voluntarily initiating this civil proceeding way back in 2009, Epstein nonetheless never once sought to stay this case pending resolution of the *Doe* matter.**

B. In 2017, Eight Years Later and on the Eve of Trial, Epstein Improperly Seeks a Continuance Based Upon *Doe*.

On July 20, 2017, this Court entered an Order Specially Setting Jury Trial, in which this case was specially set, number one, for a ten-day jury trial beginning on December 5, 2017. Since that Order, Epstein has actively availed himself of pre-trial discovery while at the same time making a concerted effort through motion practice to delay Mr. Edwards' long-awaited day in Court. This motion practice culminated in the filing of the underlying Motion for Temporary Stay of Proceedings, in which Epstein now suggests that the Court should indefinitely stay this proceeding pending a resolution of *Doe*. Again, however, what Epstein really wants is for the Court to indefinitely *continue* the special set December trial date. Epstein claims that, despite voluntarily initiating this case in 2009 and engaging in protracted litigation and discovery for the last eight (8) years, he cannot defend this case at trial and will instead “be forced to invoke his Fifth Amendment privileges” as a result of the prior-filed 2008 *Doe* proceeding.<sup>2</sup>

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<sup>2</sup> Epstein's motion begs the question of whether he ever intended to pursue the underling claims, or whether they were simply an attempt to intimidate Mr. Edwards, his clients and others into abandoning or settling their legitimate sexual abuse claims for less than their just and reasonable values.

The Court should deny Epstein's request. As demonstrated from the above-described timeline, Epstein is barred from seeking any stay/continuance under the doctrines of waiver and equitable estoppel. Moreover, even if the Court were to consider Epstein's untimely request for a stay/continuance, Epstein cannot carry his burden to justify such relief on the eve of trial. Epstein initiated this litigation eight years ago. He charged that the claims being pursued by Mr. Edwards' clients were false. After eight long years, the time has finally come for a jury to determine whether Epstein had any basis for these allegations, and Epstein cannot use the prior-filed *Doe* proceeding to avoid that determination.

#### **Memorandum of Law**

a. Epstein Waived Any Argument for a Stay/Continuance.

“Waiver is the intentional or voluntary relinquishment of a known right or conduct which warrants an inference of the relinquishment of a known right.” Aberdeen Golf & Country Club v. Bliss Const., Inc., 932 So. 2d 235, 244 (Fla. 4th DCA 2005). The elements of waiver are: (1) the existence at the time of the waiver of a right privilege, advantage or benefit which may be waived; (2) the actual or constructive knowledge of the right; and (3) the intention to relinquish the right. Goodwin v. Blu Murray Ins. Agency, Inc., 939 So. 2d 1098, 1104 (Fla. 5th DCA 2006).

Epstein clearly waived any argument that the *Doe v. United States* proceeding justifies a stay or continuance of this case. Epstein has been aware since 2008 that the *Doe* proceeding was pending and that one of the potential outcomes was the invalidation of Epstein's Non-Prosecution Agreement. Despite these facts, Epstein voluntarily filed suit against Mr. Edwards on December

7, 2009 and then engaged in the following additional affirmative acts to intentionally relinquish any right he may have had to seek a stay or continuance of this proceeding:

- (1) Actively litigating his claims for the next year and a half, during which time Epstein had the burden of proof to establish that Mr. Edwards had in fact fabricated his clients' claims against Epstein;
- (2) Filing his Amended Complaint on April 12, 2011, in which Epstein explicitly stated to the Court that one of the potential outcomes of the *Doe* proceeding was the "invalidation of the [Non-Prosecution] Agreement";
- (3) Failing to move to stay Mr. Edwards' previously-filed Amended Counterclaim, Second Amended Counterclaim or Third Amended Counterclaim, all of which included a claim for malicious prosecution;
- (4) Failing to request a stay of these proceedings after moving to intervene in the *Doe* matter on September 2, 2011;
- (5) Failing to request a stay of these proceedings after voluntarily dismissing his remaining claims against Mr. Edwards on August 16, 2012;
- (6) Failing to request a stay of these proceedings after the Court granted Mr. Edwards' an entitlement to plead for punitive damages, thereby putting Epstein's financials at issue, on December 18, 2012; and
- (7) Actively defending against Mr. Edwards' sole-remaining claim for malicious prosecution for the next five years, at both the trial and appellate levels, thereby causing the parties to incur substantial litigation-related expenses.

Certainly, it is difficult to envision a more clear-cut case of waiver, if for no other reason than it was Epstein who initiated this lawsuit in the first place, after the *Doe* proceeding had been pending for well over a year and after he was aware that the purpose of *Doe* was to invalidate the NPA. If Epstein was concerned about the interplay between these two proceedings, particularly as it relates to his Fifth Amendment protections, he should have immediately moved for a stay after

he filed suit. Epstein failed to do so, and instead chose to actively participate in this litigation for nearly a decade. Epstein's active participation in litigation that he initiated waives any argument for a stay or continuance. C.f. Gordon v. Shield, 41 So. 3d 931, 033 (Fla. 4th DCA 2010) (stating that, in the context of arbitration, a party's "active participation in litigation" serves to waive the right to arbitration).

b. Epstein is Estopped from Seeking a Stay/Continuance.

Epstein's attempt to stay/continue this case is also barred by the doctrine of equitable estoppel, which has been a fundamental principle of American jurisprudence for centuries. Florida Dept. of Health & Rehab. Services v. S.A.P., 835 So. 2d 1091, 1096 (Fla. 2002). Equitable estoppel is "based on principals of fair play and essential justice [that] arises when one party lulls another party into a disadvantageous legal position." Bueno v. Workman, 20 So. 3d 993, 997 (Fla. 4th DCA 2009). The elements of equitable estoppel are: (1) a representation as to a material fact that is contrary to a later-asserted position, (2) reliance on that representation, and (3) a change in position detrimental to the party claiming estoppel, caused by the representation and reliance thereon. Id.

Similar to waiver, it is difficult to imagine a more clear-cut example of equitable estoppel than Epstein's eleventh-hour attempt to indefinitely stay litigation **that he started, based on a situation that he created.** Epstein filed suit, representing to this Court and Mr. Edwards that Epstein intended to prove that Mr. Edwards had fabricated the sexual abuse allegations against him, and stating in no uncertain terms that "[t]his lawsuit is filed and **will be vigorously pursued**

against all these defendants.” See Epstein’s Initial Complaint at ‘Summary’. (Emphasis added). Epstein filed his Complaint with full knowledge of the pending *Doe v. United States* proceeding and the possibility that his Non-Prosecution Agreement could be invalidated.

Mr. Edwards was forced to defend against these allegations for three (3) years, in reliance on Epstein’s representations. After Epstein voluntarily dismissed his claims, Mr. Edwards then spent the next five (5) years pursuing his malicious prosecution claim, which required Epstein to put forth at least some evidence that the allegations asserted in the underlying complaint were true: Mr. Edwards’ clients had in fact pursued false sexual abuse claims against Epstein. Mr. Edwards has therefore expended substantial time and resources in this litigation in reliance on Epstein’s representation that Epstein had probable cause to pursue his claims in the first place.

Now, on the eve of trial, Epstein has changed tactics and asserted a new position: he cannot defend the malicious prosecution claims at the upcoming trial because of the 2008 *Doe v. United States* proceeding, which was filed *before* Epstein initiated this litigation. If that is true, how did Epstein intend to prove his claims against Mr. Edwards in the first place? Certainly, if Epstein could not defend against a malicious prosecution claim, then he should never have filed the underlying action to begin with. Simply put, Epstein’s eleventh-hour attempt to avoid a trial *due to circumstances that he created* is unavailing and should be rejected based on the principles of equitable estoppel.

C. Epstein Cannot Establish That a Stay/Continuance is Warranted.

Even if this Court were to consider the merits of Epstein's eleventh-hour request, Epstein cannot establish that a stay of the proceedings or continuance of the upcoming trial is warranted. As conceded by Epstein, there is no constitutional right to a stay of civil proceedings, see Epstein's Motion at p. 7, and this Court had the discretion to manage its trial docket as it sees fit.

*i. A Continuance is Not Warranted.*

Irrespective of the title of his motion, what Epstein really wants is for the Court to indefinitely continue the special-set, ten-day jury trial scheduled to begin on December 3, 2017. Florida law demonstrates that he is entitled to no such relief. When evaluating whether a moving party is entitled to a continuance, the Court should consider the following factors: (1) Whether denial of the continuance creates an injustice for the movant; (2) whether the cause of the request for continuance was unforeseeable by the movant and not the result of dilatory practices, and (3) whether the opposing party would suffer any prejudice or inconvenience as a result of a continuance. Fleming v. Fleming, 710 So. 2d 601, 603 (Fla. 4th DCA 1998).

At the risk of belaboring the point, factor (2) alone prevents Epstein from having the upcoming trial continued. Not only was the "cause of the request for the continuance" foreseeable, **but Epstein created the situation he now complains of** by initiating this civil proceeding with full knowledge that the *Doe v. United States Victims' Rights Act* case had been pending for (at that point) well over a year. Epstein even cited to *Doe* in his 2011 Amended Complaint, in which he confirmed to this Court that the purpose of *Doe* was to invalidate the NPA. Moreover, Epstein

certainly engaged in “dilatory practices” by never once requesting a continuance prior to this eleventh-hour request, and instead engaging in protracted litigation at both the trial and appellate levels for nearly eight (8) years. Quite simply, Epstein cannot stay this case based on a situation **he created eight years ago**, after never once raising the issue until this cause was set for trial.

Given that Epstein created the situation he now complains of, he cannot claim any injustice if the Court denies his request for a continuance. Epstein had eight years to consider the alleged interplay between these proceedings, and for eight years Epstein apparently decided that any Fifth Amendment concerns did not justify a stay of his civil proceeding. In any event, once Epstein filed suit seeking affirmative relief against Mr. Edwards, he was barred from using the Fifth Amendment as both a shield and sword in these proceedings. *See Rappaport v. Levy*, 696 So. 2d 526, 527 (Fla. 3d DCA 1997). Epstein therefore cannot hide behind the Fifth Amendment to continue this case. While he is within his rights to claim the Fifth Amendment privilege before the jury, Mr. Edwards is equally entitled to argue that an adverse inference may be drawn against Epstein for invoking the right to silence. *See, e.g., Atlas v. Atlas*, 708 So. 2d 296, 299 (Fla. 4th DCA 1998). As to the prejudice to be suffered by the opposing party, it is clear that delay is inherently disadvantageous to the party carrying the burden of proof, and here the delays suffered by Mr. Edwards have already been extraordinary. Further delay related to the CVRA proceedings could add many additional years of prejudice to the detriment suffered by Mr. Edwards. The CVRA case itself has no predictable end in sight, and if the victims’ claims succeed, Epstein faces the potential of years of prosecution of dozens of Federal crimes, followed by years more of

Federal appeals before his criminal jeopardy is resolved. Indeed, the issue of whether his exposure to criminal prosecution will ever end is entirely speculative.

In the meantime, the poisonous effects of Epstein's malicious lies about Edwards remain judicially unremedied. Edwards is entitled to his day in Court to publicly prove that the scurrilous claims made by Epstein were nothing but a baseless attempt at extortion.

Justice further delayed is unquestionably justice denied.

*ii. A Stay is Not Warranted.*

Florida courts have long-recognized that “[a]lthough under certain circumstances, a trial court may grant a stay in a civil proceeding *for a limited time* during the pendency of a concurrent criminal proceeding, *such a stay is not constitutionally required.*” Urquiza v. Kendall Healthcare Group, Ltd., 994 So. 2d 476, 478 (Fla. 3d DCA 2008) (emphasis added). For example, in Klein v. Royale Group, Ltd., the Third District Court of Appeal held that a stay became unreasonable fourteen months after the lawsuit was filed. 524 So. 2d 1061 (Fla. 3d DCA 1988). See also Eller Media Co. v. Serrano, 761 So. 2d 464, 467 (Fla. 3d DCA 2000) (*citing Klein*).

Consistent with the Third DCA's decision in Klein, Epstein's motion admits that stays are typically limited to the “early stages” of a related civil proceeding. See Epstein's Motion at p. 14 (*citing S.E.C. v. Alexander*, No. 10-CV-04535-LHK, 2010 WL 53880000, at \*5 (N.D. Cal. Dec. 22, 2010)). Specifically, Epstein states as follows:

“[E]xpeditious resolution of cases is, as a general matter, preferable to delay of the Court's docket. S.E.C. v. Alexander, No. 10-CV-04535-LHK, 2010 WL 53880000, at \*5 (N.D. Cal. Dec. 22, 2010). However, a number of courts have concluded that

staying a related civil proceeding *in its early stages 'may prove more efficient in the long run' in part because the 'stay will allow civil discovery to proceed unobstructed by concerns regarding self-incrimination.*

(Emphasis Epstein's). Here, however, Epstein is not seeking to stay this civil proceeding in its "early stages." Rather, Epstein is seeking a stay on the eve of trial after voluntarily initiating and actively engaging in this litigation for nearly eight (8) years. Such a request is unreasonable under the Alexander case cited by Epstein and, as recognized by Urquiza, is not constitutionally required under the Fifth Amendment. 994 So. 2d at 478.

Moreover, "[a] civil litigant's fifth amendment right to avoid self-incrimination may be used as a shield but not a sword." Rollins Burdick Hunter of New York, Inc. v. Euroclassics Ltd., Inc., 502 So. 2d 959, 962 (Fla. 3d DCA 1987). Thus, "where the party claiming a Fifth Amendment privilege is also seeking affirmative relief, that party does not enjoy a carte blanche to invoke the privilege and block its opponent's affirmative defenses." Rappaport, 696 So. 2d at 527 (holding that order indefinitely continuing trial was premature). Here, Epstein filed suit against Mr. Edwards, alleging that Mr. Edwards had fabricated certain civil claims arising from Epstein's systematic sexual abuse of minor female children as part of a fraudulent Ponzi scheme that Mr. Edwards was allegedly running with Scott Rothstein and one of Mr. Edwards' clients, L.M. Epstein has since dismissed his complaint, and the only remaining claim is Mr. Edwards' claim for malicious prosecution, which is a mirror image of those brought by Epstein in the first place. Epstein cannot seek affirmative relief against Mr. Edwards and assume the burden of proof on his claims for years, and then turn around on the eve of trial on Mr. Edwards' counterclaim and suggest

to this Court that he cannot even *defend* the validity of the lawsuit that he initiated. C.f. Rappaport v. Levy, 696 So. 2d 526, 527 (Fla. 3d DCA 1997). This was Epstein's lawsuit, and the time has come for him to defend its propriety before a jury.

### Conclusion

On December 7, 2009, Epstein initiated this civil litigation in the face of the ongoing *Doe v. United States Victims' Rights Act* proceeding. In doing so, Epstein represented to the Court that "[t]his lawsuit is filed and **will be vigorously pursued** against all these defendants." (Emphasis added). After eight (8) long years, the parties are specially set for trial beginning on December 3, 2017, and the time has come for Epstein to allow a jury to determine whether the lawsuit that he boldly promised to "vigorously pursue" had any merit in the first place. Defendant/Counter-Plaintiff respectfully submits that the Court should deny Epstein's motion and allow this determination to take place.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Edwards' Opposition to Epstein's Motion for Temporary Stay

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 October, 2017.



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