

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 FOR ADMISSIONS TO JEFFREY EPSTEIN

COMES NOW the Counter-Plaintiff, Bradley J. Edwards, by and through his undersigned counsel and propounds the following Request for Admissions pursuant to Rule 1.370 Florida Rules of Civil Procedure, requesting that Counter-Defendant, Jeffrey Epstein, admit the truth of the facts set forth as follows:

1. Admit that you have publicly been described as a billionaire.
2. Admit that press reports have described you as a billionaire.
3. Admit that you have never publicly disputed the description of you as a billionaire.
4. Admit that you have never publicly disputed any press reports describing you as a billionaire.
5. Admit that you are a billionaire.
6. Admit that you have been a billionaire sometime within the past 5 years.
7. Admit that you have been a billionaire sometime within the past 10 years.

8. Admit that you have a reputation as being a billionaire.
9. Admit that your personal net worth has exceeded a billion dollars at times during the past 5 years.
10. Admit that your personal net worth has exceeded half a billion dollars at times during the past 5 years.
11. Admit that your personal net worth has exceeded a quarter of a billion dollars at times during the past 5 years.
12. Admit that you have never paid even one penny in punitive damages to any person who has alleged that you engaged in improper sexual conduct with them while that person was a minor.
13. Admit that you have never spent even one day in a state or federal prison facility (as opposed to a county jail) as punishment for any sex-related crime.

Pursuant to the Rules of Civil Procedure, each fact on which admission is requested shall be deemed admitted if not denied or if no reply is received on or before March 28, 2013.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Request for Admissions to Jeffrey Epstein

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 26th day of February, 2013.



Jack Scarola

[Redacted text block containing several lines of obscured text]

Attorneys for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Request for Admissions to Jeffrey Epstein

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