

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).

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**DEFENDANT'S MOTION TO PERMIT ADDITIONAL INTERROGATORY**

The Defendant, Bradley J. Edwards, by and through the undersigned attorneys, moves this Honorable Court to enter an order Permitting Defendant, Jeffrey Epstein, to propound an additional interrogatory upon Plaintiff, Jeffrey Epstein, and states:

1. The Supreme Court has not approved a form of interrogatories for this type of action.
2. The elements of the claims asserted and the nature and complexity of the factual circumstances giving rise to the claims are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.
3. The elements of defenses asserted or expected to be asserted are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.

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4. The use of written interrogatories is the least burdensome, least expensive and most expeditious discovery means available to the Defendant by which to obtain necessary information and narrow trial issues.

5. The Plaintiff will not be prejudiced through the granting of this motion.

6. The foregoing factors and others to be presented upon hearing of this Motion constitute good cause for increasing the number of interrogatories permitted herein.

WHEREFORE, Defendant moves for an Order requiring permitting Defendant, Jeffrey Epstein, to propound an additional interrogatory upon Plaintiff, Jeffrey Epstein.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by <sup>FAX AND</sup> U.S. Mail to all Counsel on the attached list, this 1st day of April, 2011.

  
\_\_\_\_\_  
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COUNSEL LIST

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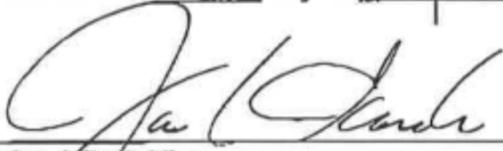
**NOTICE OF PROPOUNDING INTERROGATORY  
TO PLAINTIFF, JEFFREY EPSTEIN**

Defendant, Bradley J. Edwards, hereby provides notice that pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, that one (1) Interrogatory has been directed to Plaintiff, Jeffrey Epstein, this 1st day of April, 2011.

It is requested that the aforesaid answers be served within thirty (30) days at the offices of Searcy Denney Scarola Barnhart & Shipley, [REDACTED], 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409.

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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 on this 1st day of April, 2011.



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Attorneys for Scott Rothstein

**INTERROGATORY TO PLAINTIFF, JEFFREY EPSTEIN**

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

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1. As to every act characterized by the Plaintiff as an alleged "abuse of process" by Bradley Edwards, state the following:
  - a. An exact and detailed description of the "process" including the title of all pleadings or other documents which Plaintiff contends were abusive;
  - b. The date on which each alleged abuse occurred;
  - c. The nature of the damage suffered by the Plaintiff as a consequence of this abuse;
  - d. The amount of the damage alleged to have been caused by the abuse.

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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)