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February 01, 2013

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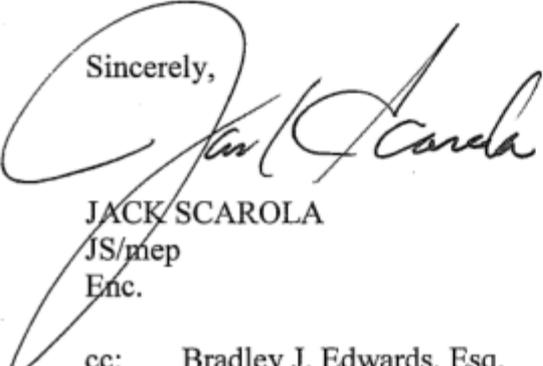
Re: Edwards adv. Epstein
Our File No.: 291874

Dear Ms. Coleman:

Attached is a proposed Confidentiality Order conforming exactly to the requirements of Judge Crow's Order of January 29 denying your Motion for Protective Order. Please confirm that this may be submitted immediately to Judge Crow for signature. Alternatively, we will address any objections you may have at the hearing already scheduled for Monday, February 4th.

Also, note that the Court did not extend the time for submission of your responses. Accordingly, those responses have been and continue to be past due. When may we expect to receive them?

Sincerely,


JACK SCAROLA
JS/mep
Enc.

cc: Bradley J. Edwards, Esq.

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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).

CONFIDENTIALITY ORDER

Pursuant to this Court's direction by Order of January 29, 2013, it is hereby,

ORDERED AND ADJUDGED that all discovery provided by the counter-defendant, Jeffrey Epstein, in response to requests concerning his personal finances shall be subject to the following conditions:

- the documents will not be filed in the public record without further order of the Court;
- the documents will not be disclosed to third-parties to this litigation (except experts who agree to be bound by the terms of this Confidentiality Order);
- the documents shall not be published or disseminated to any third-parties;
- the documents shall not be utilized in any other proceeding other than the current litigation;
- any documents produced shall be returned to the counter-defendant at the conclusion of this litigation.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Confidentiality Order

DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, this _____
day of _____, 2013.

DAVID F. CROW
CIRCUIT JUDGE

Copies have been furnished to all counsel on the attached counsel list.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Confidentiality Order

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