

JEFFREY EPSTEIN,

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Plaintiff,

vs.

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

Defendants.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S LIST OF TRIAL
EXHIBITS, TRIAL WITNESSES AND EXPERT WITNESSES PURSUANT TO
THE COURT'S ORDER DATED APRIL 2, 2013

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his list of trial exhibits, trial witnesses, and expert witnesses pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures dated April 2, 2013 as follows:

TRIAL EXHIBITS

1. Information Charging Scott W. Rothstein in *United States of America v. Stott W. Rothstein*, 09-60331-CR-COHN; dated December 1, 2009.

2. Plea Agreement between *United States of America and Scott W. Rothstein*, 09-60331-CR-COHN; filed December 1, 2009.

3. Amended Complaint in *Razorback Funding, LLC, ET AL v. Scott W. Rothstein, et al.*, in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943 (19); Lawsuit filed November 20, 2009.

4. All Videotaped Depositions taken of Scott W. Rothstein in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR.

5. All exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012.

6. Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in *In re: Rothstein Rosenfeldt Adler*, [REDACTED]; 09-34791-RBR.

7. Docket from *Doe v. United States*, 08-80736-CIV-MARRA.

8. Any and all exhibits listed by Edwards.

9. Videotaped Deposition of Bradley J. Edwards, including all exhibits used/referenced therein, which was taken by Epstein on May 15, 2013. [QUESTION – WOULD THIS INCLUDE THE FEDERAL LM COMPLAINT. IF NOT WE SHOULD MENTION THE LM COMPLAINT]

10. All documents provided to date by Bradley J. Edwards in response to Jeffrey Epstein's Second Request for Production served on December 9, 2011 (the only discovery, to date, to which Edwards has actually responded as far as we know, as everything else seems to be objections). [AS I RECALL DIDN'T EDWARDS PROVIDE TWO SETS OF DISCOVERY – ONE SET WAS THE DOCUMENTS CONSTITUTING EMAILS WITH HIM AND MEMBERS OF THE PRESS AND THE OTHER SET WAS HIS "DAMAGES DOCUMENTS"]

11. Transcripts of all depositions taken in this cause and exhibits marked at said depositions.

12. Edwards's answers to interrogatories and response to requests for production, and response to requests for admissions.

The Defendants reserve the right to produce any newly discovered evidence upon proper notice.

The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal.

The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice.

All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection at the offices of the undersigned at a mutually convenient time and date.

TRIAL WITNESSES (WE HAVE TO PROVIDE ADDRESSES FOR ALL) (DO

WE HAVE TO PROVIDE THE ADDRESSES NOW OR CAN WE SAY

ADDRESSES TO BE PROVIDED?!

1. Scott W. Rothstein
2. Ken Jenne
3. William Scherer

The following people are listed in the privilege log unless otherwise noted:

4. Spencer Kuvin
5. Katherine Ezell
6. Ami Ederi
7. Kikka Claudio
8. Paul Cassell
9. Margaret Berk
10. Mercedes Estrada
11. Jacquie Johnson
12. Adam Horowitz
13. Stuart Mermelstein
14. Lisa Rivera

15. Jack Kill
16. Carolyn Edwards
17. Robert Josefberg
18. Richard Willits
19. William J. Berger
20. Bert Patton
21. Susan K. Stirling
22. Iliana Yarzabal
23. Barry Stone
24. Alan Garten
25. Elizabeth Kim
26. Christina Fitch
27. Gary Farmer
28. Denis Kleinfeld

29. "Investigators" (from privilege log???) [DO YOU NEED TO INCLUDE

THIS IN THIS ROUND?]

30. Carl Linder
31. Cara Holmes
32. Jonathan Birkman
33. Robert C. Buschel
34. Beth Williamson
35. Mike Fisten
36. Susan K. Stirling

37. Robin T. Kempner
38. Pat Roberts
39. Amy Swan
40. Pat Diaz
41. Jeffrey Sonn (Fort Lauderdale Attorney- NOT IN PRIVILEGE LOG)

[WHERE DID THIS NAME COME FROM?]

42. Tami Wolfe
43. Steven Jaffee
44. Marc Nurik
45. Nora Batian
46. Priscilla Nascimento (Reserving conference rooms for 7/23/09 re: Epstein)

WHY IS THIS IN BOLD FACE. SHE DID RESERVE THE ROOMS ACCORDING TO THE PRIVILEGE LOG?]

47. Maribel Matiska
48. Michael Wheeler
49. Bradley Berger
50. Shawn Gilbert
51. Ronald Wise
52. Wayne Black
53. Susan Stirling
54. Kendall Coffey
55. Seth Lehrman
56. Phaedra Xanthos

57. Scott Goldstein

58. Alfredo (?) [THIS IS ALFREDO RODRIGUEZ. THE GUY WHO TRIED TO SELL THE "HOLY GRAIL" TO EDWARDS'S TEAM]

59. Earleen Cote

60. Josh Roberts

61. Carolyn, Legal Assistant to Jay Howell, Co-Counsel

62. Jay Howell (?) [WHAT ARE YOU ASKING HERE? WHETHER WE SHOULD INCLUDE HIM? IF SO ASK JE SPECIFICALLY]

63. Jack Scarola (communications between Scarola and Edwards as noted (Bates 04355-04358) in Privilege Log Dated February 23, 2011 – Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman). [ASK JE IN EMAIL]

64. Alan Sakowitz (Investor/Whistleblower to FBI- NOT IN PRIVILEGE LOG) [ASK JE IN EMAIL]

65. A. J. Discala (NOT IN PRIVILEGE LOG) [JE ALREADY SAID INCLUDE HIM AS A WITNESS]

MICHAEL LEGAMARO – I BELIEVE HE IS THE ATTORNEY FROM MORGAN LEWIS WHO LOOKED AT THE EPSTEIN CASE FILES IN ROTHSTEIN'S OFFICE

66. Other Investors??? Do we have names? [DON'T NEED THIS NOW DO WE? LOOK AT DISCALA'S DEPO. HE SAYS THAT THANE RITCHIE AND DEAN KRETSCHMAR WERE AT THE MEETING AT RRA WHERE ROTHSTEIN SHOWED THEM THE EPSTEIN FILES.]

67. Any and all witnesses listed by Bradley J. Edwards.

68. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards.

69. Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice.

70. Epstein reserves the right to call and/or produce any and all witnesses necessary for impeachment or rebuttal.

71. Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the Parties and this Court.

EXPERT WITNESSES

1. Unknown at this time.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this June 20, 2013.

/s/ Tonja Haddad Coleman
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