

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

5. The videotaped deposition and 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, P.A.*; 09-34791-RBR.

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

8. Any and all exhibits listed and/or used by Bradley J. Edwards.

9. Videotaped Deposition of Bradley J. Edwards, including all exhibits used/referenced therein, which was taken by Epstein on May 15, 2013.

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 (Darren it appears he objected to all others – at least the records we have, but number 12 seems to cover it).

11. Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by Bradley J. Edwards, including all exhibits marked at said depositions.

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

13. Complaint and Docket from *L.M. v. Jeffrey Epstein*; 09-CV-81092-COHN.

14. Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, Mark Epstein.

15. Subpoena to Leonard Baird. (sex therapist named in Complaint- we want this one too? ).

16. Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D. (as stated in Complaint- we want this one too? ).

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**

1. Scott W. Rothstein  
c/o Marc Nurik, Esq.  
Law Offices of Marc S. Nurik  
One E. Broward Blvd., Suite 700  
Ft. Lauderdale, FL 33301
2. Ken Jenne  
c/o Broward Co. Sheriff Office  
2601 W. Broward Blvd.  
Ft. Lauderdale, FL 33312-1308
3. William Scherer  
c/o Conrad & Scherer, LLP  
PB Box 14723  
Ft. Lauderdale, FL 33302-4723
4. Spencer Kuvin  
c/o Law Office of Craig Goldenfarb, P.A.  
2090 Palm Beach Lakes Blvd., Suite 402  
West Palm Beach, FL 33409-6512
5. Katherine Ezell  
c/o Podhurst Orseck PA  
25 W. Flagler St.  
Miami, FL 33130-1712

6. Ami Ederi  
Miami-Dade State Attorney's Office  
1350 NW12th Avenue  
Miami, FL 33136-2102
7. Kikka Claudio (do we know who she was at RRA)  
Address unknown at this time
8. Paul Cassell  
Borton Petrini, LLP  
1320 Columbia Street, Suite 210  
San Diego, California 92101-3436
9. Margaret Berk  
5925 Kaiser Lane  
Pensacola, FL 32507-8319
10. Mercedes Estrada  
**Rosenfeldt & Birken, P.A.**  
100 S.E. 3rd Avenue  
Suite 1300  
Fort Lauderdale, FL 33394
11. Jacquie Johnson  
Address unknown at this time
12. Adam Horowitz  
c/o Herman, Mermelstein & Horowitz, P.A.  
3351 NW Boca Raton Blvd.  
Boca Raton, FL 33431-6623
13. Stuart Mermelstein  
c/o Herman, Mermelstein & Horowitz, P.A.  
3351 NW Boca Raton Blvd.  
Boca Raton, FL 33431-6623
14. Lisa Rivera  
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110 9<sup>th</sup> Avenue, Suite A 961  
Nashville, Tennessee 37203
15. Jack Kill  
Address unknown at this time

16. Carolyn Edwards  
Address unknown at this time
17. Robert Josefberg  
Address unknown at this time
18. Richard Willits  
Richard H. Willits, P.A.  
490 Wandering Woods Way  
Ponte Vedra, FL 32081-0619
19. William J. Berger  
Weiss Handler & Cornwell PA  
2255 Glades Road, Suite 218A  
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OR [there are 2]  
Greenspoon Marder PA  
100 W. Cypress Creek Road, Suite 700  
Fort Lauderdale, FL 33309-2195
20. Bert Patton  
Address unknown at this time
21. Susan K. Stirling  
Promise Healthcare, Inc.  
999 NW 51<sup>st</sup> Street  
Boca Raton, FL 33431-4477
22. Iliana Yarzabal  
Address unknown at this time
23. Barry Stone  
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Boynton Beach, FL 33437-6491
24. Allan Garten  
U.S. Attorney's Office  
1000 SW 3<sup>rd</sup> Avenue, Suite 600  
Portland, Oregon 97204-2936
25. Elizabeth Kim  
4855 Technology Way, Suite 630  
Boca Raton, FL 33431-3351
26. Christina Fitch

Address unknown at this time

27. Gary Farmer  
Farmer, Jaffe, Weissing, Edwards Fistos & Lerhman  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301-3268
28. Denis Kleinfeld  
1001 Brickell Bay Drive, 32<sup>nd</sup> Floor  
Miami, FL 34905
29. Steve Rossi, Esq. (just thought of him)
30. Carl Linder  
Linder Law Group  
175 SW 7<sup>th</sup> Street, Suite 2410  
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31. Cara Holmes  
15751 Sheridan Street, PMB 129  
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32. Jonathan Birkman  
Quraishi & Birkman, PLLC  
809 SE 8<sup>th</sup> Street  
Deerfield Beach, FL 33441-5608
33. Robert C. Buschel  
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34. Beth Williamson  
1306 Cormorant Road  
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35. Mike Fisten  
Address unknown at this time
36. Josh Roberts  
Kirschbaum, Birnbaum, Lippman, & Gregoire  
1301 E. Broward Blvd., Suite 230  
Fort Lauderdale, FL 33301-2111
37. Robin T. Kempner

Address unknown at this time

38. Pat Roberts  
Address unknown at this time
39. Amy Swan  
Address unknown at this time
40. Pat Diaz  
Drug Enforcement Administration  
2100 N. Commerce Parkway  
Weston, FL 33326-3234
41. Jeffrey Sonn (Fort Lauderdale Attorney- NOT IN PRIVILEGE LOG)  
Broward Financial Centre  
500 E. Broward Blvd., Suite 700  
Fort Lauderdale, FL 33394-3055
42. Tami Wolfe  
Morrow, Milberg & Wolfe  
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Plantation, FL 33317-7572
43. Steven Jaffee  
Farmer, Jaffe, Weissing, Edwards Fistos & Lerhman  
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44. Marc Nurik  
c/o Marc Nurik, Esq.  
Law Offices of Marc S. Nurik  
One E. Broward Blvd., Suite 700  
Ft. Lauderdale, FL 33301
45. Nora Batian  
Address unknown at this time
46. Priscilla Nascimento  
Address unknown at this time
47. Maribel Matiska  
Address unknown at this time
48. Michael Wheeler  
Department of Juvenile Justice

2737 Centerview Drive, Suite 3220  
Tallahassee, FL 32399-0999

49. Bradley Berger  
Address unknown at this time
50. Shawn Gilbert  
Address unknown at this time
51. Ronald Wise  
Address unknown at this time
52. Wayne Black  
Address unknown at this time
53. Frank Preve  
Banyon Funding, LLC  
2455 E. Sunrise Blvd., Penthouse Suite
54. Kendall Coffey  
Coffey Burlington PL  
2699 S. Bayshore Dr., Penthouse  
Miami, FL 33133-5408
55. Seth Lehrman  
Farmer Jaffe Weissing Edwards Fistos Lehrman  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301-3268
56. Phaedra Xanthos  
Address unknown at this time
57. Scott Goldstein  
Address unknown at this time
58. Alfredo Rodriguez  
Address unknown at this time
59. Earleen Cote  
Kubicki Draper  
1 E. Broward Blvd., Suite 1600  
Fort Lauderdale, FL 33301-1845
60. Ted Morse  
Address unknown at this time

61. Carolyn, Legal Assistant to Jay Howell, Co-Counsel  
Jay Howell & Associates, PA  
6444 Cesery Blvd., Suite 250  
Jacksonville, FL 32211-3108
62. Jay Howell  
Jay Howell & Associates, PA  
6444 Cesery Blvd., Suite 250  
Jacksonville, FL 32211-3108
63. Jack (John) Scarola (communications between Scarola and Edwards as noted (Bates 04355-04358) in Privilege Log Dated February 23, 2011 – Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman).  
Seary Denny Scarola, et al.  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409-6601
64. Alan Sakowitz  
1135 Kane Concourse, Floor 3  
Bay Harbor Islands, FL 33154-2025
65. A. J. Discala  
Canvas Financial, LLC  
303 Park Avenue South, Suite 1401  
New York, NY 10001-0646
66. Thane Ritchie  
Address unknown at this time
67. Dean Kretschmar  
Address unknown at this time
68. Michael Legamaro [INCLUDED ON DARREN'S EMAIL; NOT SURE IF HE INTENDED TO INCLUDE HIM ON THIS LISE]
69. Debra Villegas  
Address unknown at this time
70. Mark Epstein?
71. WhichPilot
72. George Levin (Banyon)

73. Linda Von Allmen

72. Other Investors??? Do we have names?

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

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

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

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

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, but Epstein will amend upon proper review of all documents and discovery in this matter. .

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  
Tonja Haddad Coleman, Esq.  
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(facsimile)

**Electronic Service List**

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