

#291874/mep

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,

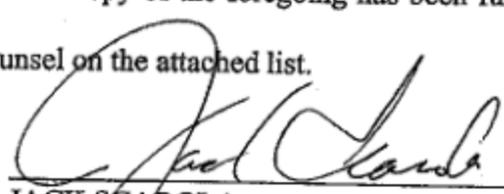
Defendant(s).

**NOTICE OF SERVING ANSWERS TO FIRST SET
OF EXPERT WITNESS
REQUEST TO PRODUCE EXPERT REPORTS**

COMES NOW the Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, and hereby files this Notice with the Court that Answers to the First Set of Expert Interrogatories propounded by the Plaintiff, Jeffrey Epstein, on November 4, 2010, have been furnished to the attorney for the Plaintiff.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this 2nd day of December, 2010 to all counsel on the attached list.

FAX AND
1



JACK SCAROLA
Florida Bar No.: 169440
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Attorney for Bradley J. Edwards

ANSWERS TO INTERROGATORIES

1. State the name, address and profession of each person whom you expect to call as an Expert witness at trial or for any other purposes in this cause.

Answer: Bradley Edwards has not retained any experts at this time. However, it is expected that some or all of the attorneys who have prosecuted civil claims against Jeffrey Epstein arising out of his abuse of children will be called to testify on behalf of Edwards and may express opinions regarding the services rendered by Edwards on behalf of his clients.

2. With regard to each listed above, state his/her background, education and experience which qualify him/her to testify as an expert in his/her area of expertise; and/or in lieu thereof, please provide a copy of each expert's most recent curriculum vitae.

Answer: N/A

3. Give the name or title of each paper which each expert has authored in the field of his/her expertise.

Answer: N/A

4. State the name, volume and page number of the publication in which each article or paper listed above can be found.

Answer: N/A

5. State the substance of the facts to which each expert listed is expected to testify.

Answer: N/A

6. Give a complete list of all documents, depositions, exhibits, plans, drawings, ordinances or statutes which each expert has used in basing his/her opinion.

Answer: N/A

7. State the opinion to which the experts aforementioned are expected to testify.

Answer: N/A

8. Give a summary of the grounds of each opinion stated.

Answer: N/A

9. Has the expert listed above practiced or worked in his/her field during the past five years?

Answer: N/A

10. If so, please state:

- a. Whether the expert was self-employed, employed by someone else or associated as a partner
- b. Each address where the expert practiced or was employed
- c. The dates the expert was with each employer
- d. The type of duty the expert performed with each employer

11. If the expert was not practiced or worked in his/her field during the last five years, what was his/her employment during this time?

Answer: N/A

12. Did the expert submit a report setting forth his/her opinions or conclusions reached from his/her examination or any tests he/she conducted?

Answer: N/A

13. Did the expert submit any other reports based upon tests, examinations or analysis of documents that he/she conducted in which he/she did not render an opinion?

Answer: N/A

14. Attach a copy of any reports made by each expert on the basis of her/her tests, examinations or analyses to your answers to these Interrogatories.

Answer: N/A

15. Is the expert to be compensated for his/her work and efforts in connection with this action?

Answer: N/A

16. Has the expert served as an expert witness in any other litigated case in the past three years?

Answer: N/A

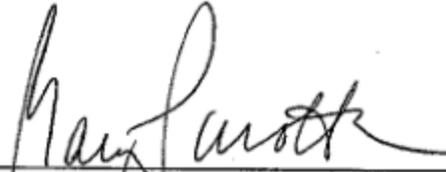


Signature of Answering Party

STATE OF FLORIDA)

COUNTY OF PALM)
BEACH

The foregoing instrument was acknowledged before me this 2ND day of December, 2010 by JACK SCARDOLA who is personally known to me or who has produced _____ (type of identification) as ~~identification~~ and who did/~~did not~~ take an oath.



Notary Public
State of Florida at Large
My Commission expires:
Commission No:



Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Answers to Expert Interrogatories

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