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October 13, 2010

Via E-Mail and U.S. Mail

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, █
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170

Re: Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG

Dear Joe:

Enclosed please find Defendant, Bradley Edwards' Motion to Compel or Alternatively Motion to Strike Plaintiff's Claim for Damages, together with a Notice of Hearing for October 21, 2010 at 8:45 a.m. If there is a possibility of resolving any of the issues raised in the motion without the necessity of court intervention, please call me.

Since my schedule often makes it difficult to reach me by phone during regular business hours, I invite you, if necessary, to call me at home in the evening at █

Sincerely,

Dictated But Not Signed By
Jack Scarola To Expedite Delivery
JACK SCAROLA
JS/sak

Enclosures

cc: All Counsel

Mr. Bradley J. Edwards

ATTORNEYS AT LAW:

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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
[REDACTED], individually,

Defendant(s).

NOTICE OF HEARING

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the following:

DATE: October 21, 2010

TIME: 8:45 AM

JUDGE: David F. Crow

PLACE: Palm Beach County Courthouse
205 N. Dixie Highway, West Palm Beach, FL 33401

SPECIFIC MATTERS TO BE HEARD:

Defendant's Motion to Compel or Alternatively to Strike Plaintiff's Claim for Damages

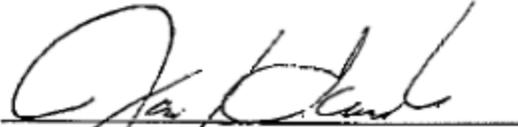
Moving counsel certifies that he or she contacted opposing counsel and attempted to resolve the discovery dispute without hearing.

***In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding, contact the Court Administrator's office not later than seven (7) days prior to the proceedings. If hearing impaired, contact (TDD) 1-800-955-8771, or (V) 1-800-955-8770 via Florida Relay.**

Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

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, this 13th day of October, 2010.



JACK SCAROLA
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& Shipley, P.A.
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West Palm Beach, Florida 33409
Phone: [REDACTED]
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Attorney for Defendant, Bradley J. Edwards

Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

COUNSEL LIST

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Attorneys for Scott Rothstein

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).

**MOTION TO COMPEL OR ALTERNATIVELY
TO STRIKE PLAINTIFF'S CLAIM FOR DAMAGES**

Defendant, Bradley J. Edwards, moves this Honorable Court to compel the Plaintiff to respond to the attached Request to Produce over the objections raised by the Plaintiff or alternatively, to strike the Plaintiff's claim for damages and in support would show that Plaintiff's response to Defendant's Request to Produce denies the Defendant access to basic information essential to enable the Defendant to prepare his defense against the Plaintiff's claim for damages. To the extent the Plaintiff's objections are not well-founded, they must be overruled and production must be compelled. To the extent the objections may be well-founded, the "sword/shield doctrine" precludes the Plaintiff from continuing to seek affirmative relief while maintaining his assertions of privilege.

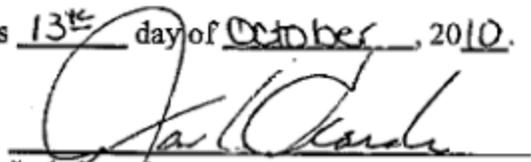
WHEREFORE, Defendant requests this Honorable Court to grant his Motion to Compel or Alternatively to Strike Plaintiff's Claim for Damages.

Case No.: 502009CA040800XXXXMBAG
Motion to Compel or Alternatively to Strike
Plaintiff's Claim for Damages

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, this 13th day of October, 2010.



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Attorney for Defendant, Bradley J. Edwards

Case No.: 502009CA040800XXXXMBAG
Motion to Compel or Alternatively to Strike
Plaintiff's Claim for Damages

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