

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

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS,  
individually, and [REDACTED], individually,

Defendants.

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**EPSTEIN'S FIRST REQUEST FOR ADMISSIONS TO EDWARDS**

Plaintiff, JEFFREY EPSTEIN, pursuant to Fla. R. Civ. P. 1.370, requests that Defendant, BRADLEY J. EDWARDS ("Edwards") admit or deny the following:

1. Admit that you caused to be filed a Complaint (DE #1) on behalf of [REDACTED] in the case styled [REDACTED] v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division on July 24, 2009. A copy of the Complaint is attached as **Exhibit A**.

2. Admit that a Complaint (DE #1) was filed on behalf of [REDACTED] in the case styled [REDACTED] v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division, under your name, Florida Bar number and e-mail address while you were employed by Rothstein, Rosenfeldt & Adler ("RRA").

3. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 is two hundred thirty-four (234) pages, contains six hundred forty-four (644) paragraphs and one hundred fifty-six (156) counts.

4. Admit that you never previously filed any complaint as a civil attorney with more than fifty (50) counts prior to the Complaint (DE #1) in Case No. 09-CV-81092.

5. Admit that you never previously filed any complaint as a civil attorney with more than one hundred (100) counts prior to the Complaint (DE #1) in Case No. 09-CV-81092.

6. Admit that you never previously filed any complaint as a civil attorney with more than one hundred fifty (150) counts prior to the Complaint (DE #1) in Case No. 09-CV-81092.

7. Admit that in your March 23, 2010 deposition you testified under oath (at page 226) that you had no other professional e-mail addresses while at RRA except

████████████████████.

8. Admit that you received an email from the federal CM/ECF system after the Complaint (DE #1) was filed in Case No. 09-CV-81092.

9. Admit that a Motion to Keep True Name Sealed in Envelope (DE #2) was filed in Case No. 09-CV-81092 under your name, Florida Bar number and e-mail address.

10. Admit that you received an email from the federal CM/ECF system after the Motion to Keep True Name Sealed in Envelope (DE #2) was filed in Case No. 09-CV-81092.

11. Admit that a Motion to Proceed Anonymously (DE #3) was filed on behalf of LM in Case No. 09-CV-81092 under your name, Florida Bar number and e-mail address.

12. Admit that you received an email from the federal CM/ECF system after the Motion to Proceed Anonymously (DE #3) was filed in Case No. 09-CV-81092.

13. Admit that the Motion to Proceed Anonymously (DE #3) asserted that LM "was an identified victim by the FBI and U.S. Attorney's office in a criminal investigation against the Defendant, Jeffrey Epstein."

14. Admit that the assertion in Request No. 13 is false.

15. Admit that Jeffrey Epstein's name is misspelled on the federal docket sheet in Case No. 09-CV-81092.

16. Admit that in your March 23, 2010 deposition you testified under oath (at page 12), there are only three cases in existence against Jeffrey Epstein in which you represent a plaintiff (Jane Doe, ■■■, and ■■■).

17. Admit that the testimony described in Request No. 16 is false.

18. Admit that in your March 23, 2010 deposition you testified under oath you only filed three cases against Jeffrey Epstein.

19. Admit that the testimony described in Request No. 18 is false.

20. Admit that in paragraph 8 of your answer to the Complaint in this action, you asserted that "RRA never filed a lawsuit on behalf of ■■■."

21. Admit that the assertion described in Request No. 20 is false.

22. Admit that in paragraph 8 of your answer to the Complaint in this action, you asserted that lawsuits filed on behalf of ■■■ and other victims "were filed by EDWARDS prior to any association with or knowledge of RRA."

23. Admit that the assertion described in Request No. 22 is false.

24. Admit that in paragraph 17 of your answer to the Complaint in this action, you admitted that “[r]elevant to this action, EPSTEIN is currently named as a defendant in three civil actions alleging, inter alia, sexual assault and battery that were handled by RRA and its attorneys including EDWARDS prior to its implosion – one of which is filed in federal court (Jane Doe v. Epstein, Case No. 08-CIV-80893, ██████████. ██████████. Fla.)(Jane Doe is a named Defendant herein), and two of which have been filed in state court in the 15<sup>th</sup> Judicial Circuit Court, Palm Beach County, State of Florida, (██████████. v. Epstein, Case No. 502008CA028051XXXXMB AB; ██████████. v. Epstein, Case No. 502008CA028058XXXXMB AB), (hereinafter collectively referred to as the “Civil Actions,” and ██████████ is a named Defendant herein). The Civil Actions were all filed in August and September of 2008.”

25. Admit that in your answer to the Complaint in this action, you never referenced the Complaint (DE #1) in Case No. 09-CV-81092.

26. Admit that you intentionally failed to disclose the existence of the Complaint (DE #1) in Case No. 09-CV-81092 in your answer to the Complaint in the action.

27. Admit that in your March 23, 2010 deposition, you never disclosed the existence of the Complaint (DE #1) in Case No. 09-CV-81092.

28. Admit that you intentionally failed to disclose the existence of the Complaint (DE #1) in Case No. 09-CV-81092 in your March 23, 2010 deposition.

29. Admit that in your March 23, 2010 deposition, you never mentioned a fourth case, Case No. 09-CV-81092, in responding to numerous questions which

referenced that you only had three pending cases against Epstein. See 3/23/10 Deposition of Brad Edwards at 12, 26, 59-60, 71, 80, 83-84,124, 301-03.

30. Admit that Scott Rothstein was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

31. Admit that Russell Adler was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

32. Admit that Ken Jenne was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

33. Admit that Michael Fisten was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

34. Admit that in paragraph 9 of the Complaint (DE #1) in Case No. 09-CV-81092 it is alleged that Epstein "coerc[ed] or forc[ed] the then-minor [REDACTED] to perform oral sex on him."

35. Admit that in her September 24, 2009 deposition LM testified under oath (at page 71), that she never had oral sex with Epstein.

36. Admit that the allegations described in Request No. 34 are false.

37. Admit that in paragraph 12 of the Complaint (DE #1) in Case No. 09-CV-81092 it is alleged that Epstein "knowingly transported [REDACTED] and other minors in interstate commerce with the intent that the [sic] [REDACTED] engage in prostitution..."

38. Admit that in her February 9, 2010 deposition LM testified under oath (at page 611) she never traveled with Epstein.

39. Admit that in paragraph 18 of the Complaint (DE #1) in Case No. 09-CV-

81092, [REDACTED]. is incorrectly identified as Jane Doe 101.

40. Admit that [REDACTED]. is not on any "list" of victims provided to Epstein or his attorneys as alleged in paragraph 19 of the Complaint (DE #1) in Case No. 09-CV-81092.

41. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 alleges one hundred fifty-six (156) counts against Epstein that correlate to one hundred fifty-six different times LM allegedly went to Epstein's house.

42. Admit that in her September 24, 2009 deposition LM testified under oath (at pages 74, 126 and 164) she went to Epstein's house either more than fifty (50) times or more than seventy (70) times, but never testified in deposition or answered a discovery request indicating that she had been to Epstein's house on one hundred fifty-six (156) occasions.

43. Admit there was no factual basis to assert one hundred fifty-six (156) counts against Epstein in the Complaint (DE #1) in Case No. 09-CV-81092.

44. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 was never served on Jeffrey Epstein.

45. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 was shown to investors to attempt to obtain money in furtherance of the Ponzi scheme described in Exhibit 1 (the Information filed by the federal government in U.S. v. Rothstein, Case No. 09-60331CR-Cohn, U.S. District Court, Southern District of Florida) to the Complaint in this action.

46. Admit that [REDACTED]. had previously filed an action against Epstein on

September 11, 2008 styled █████. v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

47. Admit that the lawsuit described in Request No. 46 was pending in July 2009 when the Complaint (DE #1) in Case No. 09-CV-81092 was filed.

48. Admit that the lawsuit described in Request No. 46 is still currently pending and seeks damages based on theories other than exclusive remedies pursuant to 18 U.S.C. §2255.

49. Admit that because █████ was not identified as a victim by the federal government, was not on the "list" referenced in paragraph 19 of the Complaint (DE #1) in Case No. 09-CV-81092 and has a state court action seeking tort damages based on other legal theories, the agreement between the federal government and Epstein has no application to the claims set forth in the Complaint (DE #1) in Case No. 09-CV-81092.

50. Admit that the Civil Cover Sheet (attached as **Exhibit B**) filed with the Complaint (DE #1) in Case No. 09-CV-81092 identifies Bradley J. Edwards and the RRA firm as counsel for █████.

51. Admit that the signature on page 234 of the Complaint (DE #1) in Case No. 09-CV-81092 is the same as the signature on page 15 of the Third Amended Complaint filed in █████. v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB.

52. Admit that the individual who signed the Complaint (DE #1) in Case No. 09-CV-81092 is currently a partner at the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL.

53. Admit that the individual who signed the Complaint (DE #1) in Case No. 09-CV-81092 is currently an employee at the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL.

**Certificate of Service**

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this \_\_\_\_ day of June, 2010:

Gary M. Farmer, Jr., Esq.  
Farmer, Jaffe, Weissing, Edwards, Fistos  
& Lehrman, PL  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
[REDACTED]  
954-524-2822 – fax  
*Attorneys for Defendant, [REDACTED].*

Jack Alan Goldberger, Esq.  
Atterbury Goldberger & Weiss, [REDACTED].  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401-5012  
Fax: 561-835-8691  
*Co-Counsel for Defendant Jeffrey Epstein*

Jack Scarola, Esq.  
Searcy Denney Scarola Barnhart &  
Shipley, [REDACTED]  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409  
[REDACTED]  
383-9424 F  
*Attorneys for Defendant Bradley Edwards*

MARC S. NURIK, ESQ.  
Law Offices of Marc S. Nurik  
One East Broward Boulevard  
Suite 700  
Fort Lauderdale, FL 33301  
[REDACTED]  
954-745-3556 Fax  
*Attorneys for Defendant Scott Rothstein*

**FOWLER WHITE**  
(Add firm/attorney info)