

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

Case No. 50 2009CA040800XXXXMB AG

JEFFREY EPSTEIN

Plaintiff,

v.

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

Defendants.

**EPSTEIN'S MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO EDWARDS' REQUEST TO PRODUCE**

Plaintiff, JEFFREY EPSTEIN ("Epstein"), pursuant to Fla. R. Civ. P. 1.090(b), moves for an enlargement of time to respond to Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") Request to Produce and states:

1. On March 18, 2010, Edwards served Epstein with a Request to Produce (attached as **Exhibit A**).
2. As the Request to Produce was served via U.S. Mail only, Epstein's response to thereto is currently due on or before April 22, 2010
3. The first request seeks documents upon which Epstein relies in support of his claim for damages against Edwards, including all agreements with attorneys, invoices for attorney services, time records, and documents related to expenditures. See Exhibit A.
4. The second request seeks prescriptions for corrective lenses. See Exhibit A. Epstein has no objection to said request and is attaching the responsive document as **Exhibit B**.

5. Epstein requests a thirty (30) day enlargement of time to respond to the first request in Edwards' Request to Produce. Epstein's counsel is currently reviewing documents potential responsive to Edwards' first request and determining all applicable objections including work product and attorney-client privilege. In addition, to the extent Epstein may produce documents responsive to Edwards' first request, his counsel needs additional time to redact any such documents to preserve attorney-client and work product privileges.

6. This action is set for trial on the Court's October 25, 2010 docket and Edwards will not be prejudiced by the requested enlargement of time.

WHEREFORE, Plaintiff, JEFFREY EPSTEIN, pursuant to Fla. R. Civ. P. 1.090(b), requests the Court grant a thirty (30) day enlargement of time to respond to Defendant/Counter-Plaintiff, Bradley J. Edwards' Request to Produce and grant any additional relief the Court deems just and proper.

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 20th day of April, 2010:

Gary M. Farmer, Jr., Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Avenue, Suite 2
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[REDACTED] – fax
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West Palm Beach, FL 33409

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
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Fax: [REDACTED]
Co-Counsel for Defendant Jeffrey Epstein

Law Offices of Marc S. Nurik
Counsel to Scott Rothstein
One East Broward Boulevard, Suite 700
Fort Lauderdale, FL 33301



F

Attorneys for Defendant Bradley Edwards



BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 Banyan Boulevard
Suite 400
West Palm Beach, FL 33401



Fax

By:

Robert D. Critton, Jr.
Florida Bar [Redacted]
Michael J. Pike
Florida Bar [Redacted]

(Counsel for Defendant Jeffrey Epstein)

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

DEFENDANT/COUNTERPLAINTIFF'S
REQUEST TO PRODUCE TO JEFFREY EPSTEIN

Defendant/Counterplaintiff Bradley J. Edwards by and through the undersigned counsel, request, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff, Jeffrey Epstein, produce and permit to inspect and copy each of the following documents*:

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

EXHIBIT A

It is requested that the aforesaid production be made within thirty (30) days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

1. All documents* upon which the Plaintiff does or may rely in support of his claim for damages against the Defendants, including but not limited to:

a. All agreements with attorneys, the payment of whose services are alleged as an element of damages;

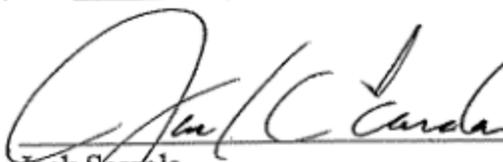
b. All invoices for attorney services and costs alleged as an element of damages;

c. All time records reflecting services rendered, the payment for which is alleged as an element of damages;

d. Every cancelled check, receipt, ledger entry, and other document of whatever kind or description reflecting, referencing, evidencing, or relating to every expenditure by you or on your behalf which expenditure is alleged as an element of damages.

2. Any and all prescriptions for corrective lenses issued to you within the past five (5) years.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
U.S. Mail to all Counsel on the attached list, this 18th day of March 2010.



Jack Scarola
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Searcy Denney Scarola Barnhart & Shipley, P.A.
139 Palm Beach Lakes Boulevard
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Phone: [REDACTED]
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Attorney for Defendant/Counterplaintiff
BRADLEY J. EDWARDS

COUNSEL LIST

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Counsel for Scott Rothstein



The Eye Center

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DR. ARNOLD M. SEMEL
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R_x FOR M Epstein, Jeffrey 10/02 2009
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ADD
+2.25

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EXHIBIT B