

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,

Defendant.

**NOTICE OF SERVICE OF DEFENDANT EDWARDS'S ANSWERS TO
PLAINTIFF'S FIRST INTERROGATORIES**

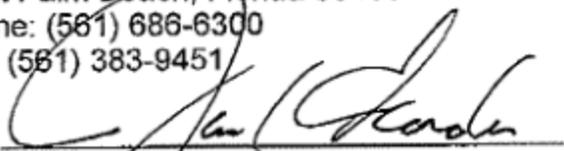
Defendant, Bradley Edwards hereby files his Notice of Service of Defendant's
Answers to Plaintiff's First Interrogatories propounded on April 5, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been
furnished via ^{FAX AND} U.S. Mail to all counsel on the attached list on May 11th, 2010.

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By:



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Case No.: 502009CA040800XXXXMBAG
Defendant's Answers to Interrogatories

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ANSWERS TO INTERROGATORIES

1. As to paragraph 12 of your Counterclaim, state the following in detail:

a) Identify specifically all damages which you claim you have suffered to your reputation. Include in your response, how your reputation has been damaged, to whom (person or entity) your reputation has been damaged, any loss of income which you claim as a result of the current lawsuit against you and how you calculate that loss.

ANSWER:

I have spent more than 50 hours of time defending this action against me. The lawsuit against me was made public and makes serious allegations that I have personally committed criminal acts that involve dishonesty. I have been asked about this lawsuit by a number of people on multiple of occasions. Current clients have inquired and prospective clients have been and continue to be placed on notice of these false allegations.

b) Identify in detail how the lawsuit filed against you has interfered in any professional relationships. Identify in your answer all professional relationships which have in any way been negatively impacted or lost or compromised as a result of this lawsuit. Identify the name and address of the individual and/or entity with whom you have the professional relationship, how it has been affected and identify any monetary damage which you sustained.

ANSWER:

Not yet completely determined at this time.

c) Identify by date the exact amount of time (and specify how your time was spent) that has been diverted from your professional responsibilities.

ANSWER:

Not yet completely determined at this time.

2. (a) Identify all costs and/or fees you have incurred (to whom and under what circumstances) for the defense of the Epstein claim as set forth in paragraph 12 of your Counterclaim.

ANSWER:

Not yet completely determined at this time.

(b) State whether you have a written or oral fee agreement with Searcy Denney and the terms of same. Include amount of money paid to date and if you paid a retainer.

ANSWER:

Written.

3. During the time you were associated with Rothstein, Rosenfeldt & Adler, P.A. ("RRA"), state the following:

a) Identify by person and date any person who performed any searches of trash at 358 El Brillo Way, Palm Beach, Florida which is alleged to be the home of Mr. Epstein which were authorized by you or which you learned had taken place, if not authorized by you. If not authorized by you, identify who did authorize it?

ANSWER:

Nobody.

b) Identify all individuals at the RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators who conducted wire taps or "bugging" on any telephones which purported to be from the home of Mr. Epstein. Include who authorized the wire taps and dates it took place.

ANSWER:

Nobody.

c) Identify all individuals at the RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators who conducted wire taps or

"bugging" on any telephones which are purported to be from the attorneys for Mr. Epstein including but not limited to: Roy Black, Alan Dershowitz or Jack Goldberger. Include who authorized the wire taps and dates it took place.

ANSWER:

Nobody.

d) Identify all intercepted phone conversations authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators and/or RRA investigators; identify the date, the source of the call, who conducted the intercepted telephone conversations and whether a tape and/or transcript exist of such conversations.

ANSWER:

Nobody

e) Identify all intercepted cell phone conversations authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators and/or RRA investigators; identify the date, the source of the call, who conducted the intercepted cell phone conversations and whether a tape and/or transcript exist of such conversations.

ANSWER:

Nobody

f) Identify all individuals at the RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators who intercepted or acquired electronic mail (e-mails) to and from the home of Mr. Epstein. Include who authorized the interception and acquisition and dates it took place.

ANSWER:

Nobody

g) Identify all individuals at the RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA or its attorneys or investigators who intercepted or acquired electronic mail (e-mails) to and from the attorneys for Mr. Epstein including but not limited to: Roy Black, Alan Dershowitz or Jack Goldberger. Include who authorized the interception and acquisition and dates it took place.

ANSWER:

Nobody

4. Identify the names and addresses of all individuals who will testify that a sexual assault took place on an airplane purportedly owned by Mr. Epstein or a Jeffrey Epstein entity at any time between 1998 and 2005. Additionally, identify any alleged celebrity, dignitary or international figure who purportedly was on board the airplane at the time of the alleged sexual assault.

RESPONSE:

Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence, and is protected by the work product privilege.

5. Identify in detail the amount of all costs (including photocopies, telephone, fax, research, investigation, travel expenses, deposition related costs, expert costs, etc.) that were incurred by you in the representation of you and/or your law firm in representing Jane Doe, L.M. and E.W. prior to joining RRA.

RESPONSE:

Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence, and is protected by the work product privilege.

6. Identify in detail the amount of costs (including photocopies, telephone, fax, research, investigation, travel expenses, deposition related costs, expert costs, etc.) that were incurred by RRA in its representation of Jane Doe, L.M. and E.W. during the time you were employed by RRA (or that is being claimed by the trustee in bankruptcy for RRA). Segregate by each of your 3 clients.

RESPONSE:

Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence, and is protected by the work product privilege.

7. In the attached transcript dated July 31, 2009, you stated to Judge Hafele with regard to the E.W. and L.M. cases the following:

"What the evidence is really going to show is that Mr. Epstein – at least dating back as far as our investigation resources have permitted, back to 1997 or '98 – has every single day of his life, made an attempt to sexually abuse children.

We're not talking about five, we're not talking about 20, we're not talking about 100, we're not talking about 400, which I believe, is the number known to law enforcement, we are talking about thousands of children, and it is through a very intricate and complicated system that he devised where he has as many as 20 people working underneath him that he is paying well to schedule these appointments, to locate these girls."

(A) State all evidence to support this assertion including any individuals and/or documents which are the source of the information and identify by name and address who currently has that information.

(B) List the name and addresses of all females to whom you were referring in your representation to the court.

RESPONSE:

Objection, relevance, work product privilege and attorney client privilege.

8. During the time you were employed/associated with RRA, state the names of all attorneys at the RRA firm with whom you discussed potential deponents or who participated in any decision to depose witnesses in the Jane Doe, L.M. or E.W. cases.

RESPONSE:

Objection, work product privilege and attorney client privilege.

9. During the time you were employed/associated with RRA, state the names of all paralegals or investigators at the RRA firm with whom you discussed potential deponents or who participated in any decision to depose witnesses in the Jane Doe, L.M. or E.W. cases.

RESPONSE:

Objection, work product privilege and attorney client privilege.