

#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  
█, individually,

Defendant(s).

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**DEFENDANT/COUNTERPLAINTIFF, EDWARDS', MOTION FOR LEAVE TO  
ASSERT CLAIM FOR PUNITIVE DAMAGES**

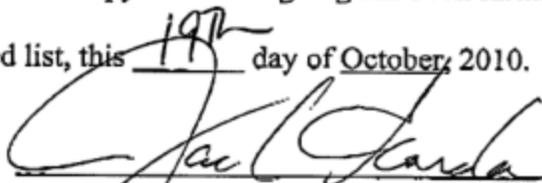
Counter-plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an Order granting him leave to assert a claim for punitive damages against the Counter-defendant, JEFFREY EPSTEIN, and in support thereof would show that the record evidence presented to the Court in support of Edwards' Motion for Summary Judgment satisfies the statutory prerequisites for the assertion of a punitive damage claim. Specifically, the evidence establishes that EPSTEIN's Complaint against EDWARDS;

1. was filed in the total absence of evidence to support any allegation of wrongdoing on the part of EDWARDS;
2. was filed in the total absence of evidence that EPSTEIN had sustained damage as a consequence of any misconduct other than his own well-established criminal enterprise;

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3. was filed in the absence of any intention to meet his own obligation to provide relevant and material discovery;
4. was filed for the sole purpose of attempting to intimidate both EDWARDS and EDWARDS' clients and others into abandoning their legitimate claims against EPSTEIN.

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 19<sup>th</sup> day of October, 2010.



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