

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION  
[www.flsb.uscourts.gov](http://www.flsb.uscourts.gov)

IN RE: CASE NO.: 09-34791-RBR  
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11  
Debtor.

**MOTION FOR RELIEF FROM AMENDED ORDER [D.E. 1068]**  
**AND TO COMPEL JEFFREY EPSTEIN TO PAY FOR THE**  
**PRODUCTION OF ALL DOCUMENTS IN RESPONSE TO HIS REQUEST**

Movants, LM and Bradley J. Edwards, move this Court for relief from Amended Order [D.E. 1068] related to the production of documents requested by Jeffrey Epstein and to Compel Jeffrey Epstein to Pay for the Production of all Documents which he has requested, and in support thereof, states as follows:

1. Brad Edwards, an attorney employed by Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. ("Farmer Jaffe Weissing"), has represented LM and other women who allege that they were sexually exploited, sexually abused, and otherwise victims of intentional and despicable conduct of Jeffrey Epstein. Epstein's conduct has been the subject of several lawsuits vigorously litigated by Mr. Edwards, as well as similar lawsuits filed by other well-known attorneys and law firms on behalf of other victims.

2. Epstein filed a frivolous lawsuit against Attorney Edwards and his client LM, who is one of Epstein's former victims, and through this lawsuit has sought voluminous discovery from the Trustee, including many documents which are patently subject to claims of privilege and/or attorney work product and/or privacy. Epstein's requests were so overbroad that they include the entire legitimate case files and investigative files of Attorney Edwards.

3. The Court previously entered Amended Order [D.E. 1068] which crafted a

procedure by which the undersigned counsel would have a reasonable opportunity to review those documents in the Trustee's possession which are responsive to Epstein's request. Accordingly, the Amended Order directed the Trustee to provide the undersigned counsel with documents and ESI in response to a state court subpoena duces tecum served by Jeffrey Epstein. This Amended Order directs the undersigned counsel to prepare and file a privilege log and imposes the expense associated with printing all documents produced by the Trustee on undersigned counsel.

4. Prior to receiving the CD from Trustee's counsel the undersigned, as well as perhaps all parties involved, was under the impression that the production consisted of approximately 6,000 pages of documents.

5. In fact, it was during, or just after, the hearing on Special Master's Motion to Clarify Order Appointing Special Master when Trustee's counsel realized that the Trustee may be in possession of additional ESI stored in a Fortis file system.

6. Consequently, the Trustee has now produced to the undersigned counsel two compact discs ("CDs") which contain approximately 74,000 pages of documents.

7. Additionally, one of the files produced by Trustee was a corrupt and unworkable file; on October 25, 2010 Movants requested that this corrupted file be resent to their office. In addition, Movants requested that the files be Bates stamped electronically so that a better record for the privilege log can be created. To date Movants still have not received the new disc(s).

8. Once Movants receive all files in a workable format, reviewing 74,000 pages of documents and creating a privilege log will take considerable more attorney time than was anticipated. Consequently, Movants are requesting an additional 30 days to complete this process.

9. In accordance with this Court's order, undersigned counsel have obtained an estimate of the printing and bates stamping costs associated with printing this 74,000 page collection of documents requested by Epstein. The cost of printing these documents exceeds \$7,000 (\$0.10 per page x 74,000 pages).

10. Epstein, through counsel, has previously represented to the Trustee that he is willing to bear the reasonable expense associated with this production, and in fact the original Order that contemplated Special Master Carney preparing the Privilege log (DE 888) directly stated, "All legal fees and costs incurred by the Special Master shall be paid by Epstein, who has already agreed to pay directly all such fees and costs."

11. With approximately 74,000 pages to print, bates stamp, review, and create a privilege log that can only be done by the attorneys that handled or are handling the Epstein-related cases, it will take many full days for the attorneys to complete, and the attorneys engaging in this exercise should be compensated for their time.

12. It is entirely reasonable that Epstein, the party seeking this discovery, bear the printing expense and other reasonable costs and attorney's fees associated with his discovery request.

**WHEREFORE**, based on the foregoing, LM and Attorney Edwards request that the Court grant this motion for relief from amended order [DE 1068] and enter an order which compels Epstein to prepay the cost of printing all documents responsive to his request as well as reasonable attorney's fees for this time-consuming task and enlarging the time for the undersigned counsel to file a privilege log by thirty days from the date that Epstein pays the printing costs, and granting any other relief the Court deems appropriate.

**I HEREBY CERTIFY** that, pursuant to L.R. 9073-1(D), Movant's counsel has

contacted Epstein's counsel in a good faith attempt to resolve the matter without a hearing and I further certify that a true and correct copy of the foregoing was served on electronically to the examinee, the debtor, the attorney for the debtor, the trustee, all CM/ECF subscribers, and by email or U.S. Mail on those parties listed on the attached service list this 2nd day of November, 2010.

**I HEREBY CERTIFY** that I am admitted to the Bar of the United State District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

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