

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,)
)
Plaintiff,) **CASE NO.:** 502008CA028051XXXMB AD
)
vs.)
)
JEFFREY EPSTEIN,)
)
Defendant.)
_____)

NOTICE OF PRODUCTION FROM NON-PARTY
Pursuant to Florida Rules of Civil Procedure 1.351

YOU ARE HEREBY NOTIFIED that after ten (10) days from the date of service of this notice, if service is by facsimile, or 15 days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue the attached subpoena directed to the following entities:

1. MRC – Greens Pharmacy

Who is/are not a party/parties to this suite, to produce the items listed at the time and place specified on the subpoena.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail and Facsimile this 12 day of August, 2009 to: Michael Burman, Esq., & Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., Jay Howell & Assoc., 644 Cesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

Case No. 502008CA028051XXXXMB AD

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone [REDACTED]
Telecopier [REDACTED]

By: 

Bradley J. Edwards
Florida Bar No. 542075
[REDACTED]

William J. Berger
Florida Bar No. 197701
[REDACTED]

Copies Furnished to:

Esquire Court Reporting

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SUBPOENA DUCES TECUM
WITHOUT DEPOSITION
(Documents may be mailed in lieu of appearance)

THE STATE OF FLORIDA TO:

**Medical Records Custodian
GREENS PHARMACY
151 North Country Road
Palm Beach, FL 33480**

YOU ARE COMMANDED to appear at the law offices of **ROTHSTEIN ROSENFELDT ADLER**, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301 **on or before the September 28, 2009, at 10:00 a.m.**, and to have with you at that time and place the following:

A complete computer printout of any and all prescriptions for medication, name and type of prescription, and all other documentation or information on or regarding:

Jeffrey Epstein
Date of Birth: 1/20/53

PLEASE TAKE FURTHER NOTICE that this subpoena requires production of your complete, entire file contents. You are to produce each and every piece of paper contained in your files regarding the above individual, whether or not prepare by you.

This further includes telephone messages, letters from attorneys, letters from the above individual, or from any other source. You are not permitted to edit or delete items. Failure to comply fully may result in court sanctions.

These items may be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the undersigned attorney whose name appears on this subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

1. **Appear as specified; or**
2. **furnish the records instead of appearing as provided above; or**
3. **object to this subpoena,**

you may be in contempt of court.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

Dated: August 12, 2009.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33301

Tel: [REDACTED]

Fax: [REDACTED]

Email: [REDACTED]

By: 

BRAD EDWARDS, ESQ.
Florida Bar No.: 542075