

#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
L.M., individually,

Defendant(s).

FILED
2011 APR 20 PM 3:17
SHARON R. BUCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 3

REQUEST TO PRODUCE TO JEFFREY EPSTEIN

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

1. All documents* constituting, reflecting, or relating to communications between Plaintiff or any agent of Plaintiff, on the one hand, and William Scherer, or any person associated with William Scherer in the practice of law, any prosecuting, law enforcement, and/or government entity which communication relates directly or indirectly to any allegation of illegal activity or tortuous conduct in which Epstein is alleged to have engaged.

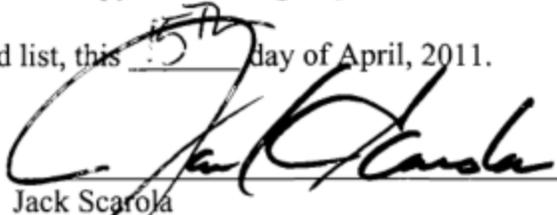
*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to

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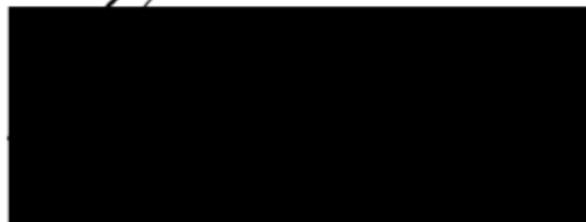
whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but 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.

It is requested that the aforesaid production be made within thirty 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.

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 15th day of April, 2011.



Jack Scarola



Attorneys for Bradley J. Edwards

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COUNSEL LIST

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