

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

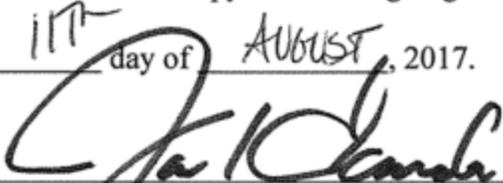
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

**NOTICE OF SERVING ANSWERS TO INTERROGATORIES
PROPOUNDED BY COUNTER-DEFENDANT JEFFREY EPSTEIN**

Bradley J. Edwards, by and through his undersigned counsel, hereby files this Notice of Serving Answers to Interrogatories with the Court propounded by the Counter-Defendant, Jeffrey Epstein, on July 12, 2017, which have been furnished to the attorneys for the Counter-Defendant.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 13th day of AUGUST, 2017.



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COUNSEL LIST

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Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein

INTERROGATORIES

As to every individual identified on your List of Trial Witnesses, and each category/group of witnesses listed thereon, please provide with particularity the following:

1. The proper name, address, telephone number, electronic mail address, or other means of contact for each witness:

ANSWER:

	DESCRIPTION OF WITNESSES
	<u>WITNESSES EXPECTED TO BE PRESENTED</u>
1.	<p>Jeffrey Epstein</p> <p>2-3 (Expected to refuse to testify on each element of the claim for Malicious Prosecution). Consistent with prior assertions of privilege.</p>
2.	<p>████████████████████</p> <p>c/o John Stephenson 1201 W. Peachtree Street Atlanta, Georgia 30339</p> <p>2-3 Expected to testify about each element of malicious prosecution except bonafide termination and damages. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages) Subject to assertions of privilege</p>
3.	<p>████████████████████</p> <p>c/o Erica Dubno 767 Third Avenue, Suite 3600 New York, New York 10017</p> <p>2-3 Expected to testify about each element of malicious prosecution except bonafide termination and damages. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages) Subject to assertions of privilege</p>
4.	<p>████████████████████</p> <p>c/o Stan Pottinger</p>

	DESCRIPTION OF WITNESSES
	<p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages through her own knowledge and experiences with Epstein.</p>
9.	<p>Robert Josefsberg, Esquire PODHURST ORSECK, PA, 25 W FLAGLER STREET, STE 800, MIAMI, FL 33131</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages. Will confirm the propriety of Edwards' actions.</p>
10.	<p>Detective Joseph Recarey Palm Beach Police Department 345 South County Road Palm Beach, FL 33480</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages.</p>
11.	<p>Chief Michael Reiter Palm Beach Police Department 345 South County Road Palm Beach, FL 33480</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages.</p>
12.	<p>John Connolly c/o Simon & Schuster 1230 6th Avenue New York, New York 10020</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of</p>

	DESCRIPTION OF WITNESSES
	the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages.
13.	<p>Charles Lichtman, Esquire 350 East Las Olas Boulevard Suite 1000 Fort Lauderdale, FL 33301</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify as to the falsity of the claims made by Epstein against Edwards and the propriety of Edwards' actions.</p>
14.	<p>William Scherer, Esquire 633 S Federal Hwy #800 Fort Lauderdale, FL 33301</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify as to the falsity of the claims made by Epstein against Edwards.</p>
15.	<p>Antonio Figueroa (Tony) Palm Coast, Florida</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages through his own knowledge and experiences with Epstein.</p>
16.	<p>Records Custodian of Palm Beach Police Department 345 South County Road Palm Beach, FL 33480</p>
17.	Records Custodian of United States Attorney's Office for the Southern District of Florida
18.	Records Custodian of the Federal Bureau of Investigations
19.	<p>Spencer Kuvin, Esquire 1800 S. Australian Avenue, #400 West Palm Beach, Florida 33409</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.</p>
20.	<p>Theodore Leopold, Esquire 2925 PGA Boulevard Palm Beach Gardens, Florida 33410</p>

	DESCRIPTION OF WITNESSES
	2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.
21.	<p>Rinaldo Rizzo c/o Robert Lewis 228 East 45th Street 17th Floor New York, NY 10017</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages through his own knowledge and experiences with Epstein.</p>
22.	<p>Adam Horowitz, Esquire 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.</p>
23.	<p>Isidro M. Garcia, Esquire Garcia Law Firm, P.A. 224 Datura Street, Suite 900 West Palm Beach, FL, 33401</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.</p>
24.	<p>All of the Lawyers who Represented Victims of Jeffrey Epstein.</p> <p>2-3 Expected to testify about the malicious prosecution elements of absence of probable cause and malice. Will testify to the truth of the claims prosecuted by Edwards against Epstein, the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of</p>

	DESCRIPTION OF WITNESSES
	punitive damages. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.
	<p style="text-align: center;"><u>WITNESSES WHICH MAY BE CALLED IF NEED ARISES</u></p> <p>2-3. Each of the witnesses listed below as numbered 25-157 (with the exception of records custodians) has information pertaining to the malicious prosecution elements of absence of probable cause and malice. If called, each could provide information regarding the truth of the claims prosecuted by Edwards against Epstein, and the likelihood that the discovery conducted by Edwards would have resulted in relevant information to proving aspects of the various sexual abuse cases being prosecuted by Edwards at the time, including on the issue of punitive damages.</p>
25.	[REDACTED]
26.	Landon Thomas c/o New York Times 620 Eighth Avenue New York, NY 10018
27.	Oren Kramer c/o Boston Provident, L.P. 717 5th Avenue #12A New York, NY 10022
28.	Lawrence LaVecchio United States Attorney's Office Southern District of Florida Broward Financial Center Fort Lauderdale, Florida. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.
29.	[REDACTED] c/o Brad Edwards, Farmer Jaffe Weissing 425 North Andrews Avenue Fort Lauderdale FL 33301
30.	[REDACTED]
31.	[REDACTED]
32.	[REDACTED] c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301
33.	[REDACTED] c/o Jack Scarola SEARCY DENNEY, ET AL.

	DESCRIPTION OF WITNESSES
	2139 PALM BEACH LAKES BLVD. West Palm Beach, FL 33409
34.	[REDACTED] c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131
35.	Brandy Brenson c/o Spencer Kuvin 1800 South Australian Ave #400 West Palm Beach, Florida, 33409
36.	[REDACTED] c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131
37.	[REDACTED] c/o Spencer Kuvin 1800 South Australian Ave #400 West Palm Beach, Florida, 33409
38.	[REDACTED] c/o Bradley Edwards, Esq. FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301
39.	Paul Cassell, Esq. 383 S. University Street Salt Lake City Utah, UT 84112
40.	[REDACTED] c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301
41.	[REDACTED]
42.	[REDACTED] c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131
43.	[REDACTED] c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800

	DESCRIPTION OF WITNESSES
	MIAMI, FL 33131
44.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
45.	<p>Prince Andrew Albert Christian Edwards Duke of York, Buckingham Palace Road London SW1A 1AA</p>
46.	<p>Frederic Fekkai Address Currently Unknown</p>
47.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
48.	<p>Lesley Groff c/o Mike Miller 1114 Avenue of the Americas New York, NY 10036</p>
49.	<p>Dave Rogers c/o Bruce Reinhart 505 S. Flagler Drive, Ste 300 West Palm Beach, FL 33401</p>
50.	<p>██████████ c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>
51.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
52.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
53.	<p>██████████ c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>

	DESCRIPTION OF WITNESSES
54.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
55.	<p>Tod Meister ██████████ Palm Beach, FL 38480</p>
56.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
57.	<p>██████████ c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA, 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131</p>
58.	<p>██████████ c/o Spencer Kuvin 1800 South Australian Ave #400 West Palm Beach, Florida, 33409</p>
59.	<p>██████████ c/o Marshall Dore Louis 40 NW third Street, Suite 200 Miami, FL 33128</p>
60.	<p>Jason Richards Federal Bureau of Investigation 16320 NW 2nd AVE., MIAMI, FL 33169</p>
61.	<p>██████████ c/o Bradley Edwards, Esq. FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2, FT. LAUDERDALE, FL 33301</p>
62.	<p>██████████ c/o Bradley Edwards FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2, FT. LAUDERDALE, FL 33301</p>
63.	<p>██████████ c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>

	DESCRIPTION OF WITNESSES
64.	<p>██████████ c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>
65.	<p>██████████ c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>
66.	<p>Nezbitt Kurkendall Federal Bureau of Investigation 16320 NW 2nd AVE. MIAMI, FL 33169</p>
67.	<p>██████████ c/o Isidro M. Garcia Garcia Law Firm, P.A. 224 Datura Street, Suite 900 West Palm Beach, FL, 33401</p>
68.	<p>Igor Zinoviev Address Currently Unknown</p>
69.	<p>██████████ Address Currently Unknown</p>
70.	<p>██████████ ██████████ ██████████</p>
71.	<p>Seth Lehrman 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>
72.	<p>Matt Weissing 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301</p>
73.	<p>Maria Villafana 500 S. Australian Avenue, #400 West Palm Beach, FL 33401. Will also confirm the leadership role played by Edwards in the prosecution of civil claims against Epstein and the propriety of Edwards' actions.</p>
74.	<p>Any additional individuals identified as victims by the United States Attorney's Office and whose identities were conveyed to Jeffrey Epstein as part of a list supplied as it related to the NPA</p>
75.	<p>Leslie Wexner Three Limited Parkway Columbus, Ohio 43206. Subject to assertions of privilege</p>
76.	<p>Donald Trump c/o Alan Garten, Esq. 725 Fifth Avenue</p>

	DESCRIPTION OF WITNESSES
	New York, NY 10022. Subject to the assertions of privilege
77.	Larry Visoski [REDACTED] RIVIERA BEACH, FL 33401
78.	[REDACTED]
79.	[REDACTED] C/O ATTORNEY WILLIAM UNROCH 140 WEST END, APT 30-BW NEW YORK, NY 10023
80.	[REDACTED] c/o Spencer Kuvin 1800 S. Australian Avenue, #400 West Palm Beach, Florida 33409
81.	[REDACTED]
82.	[REDACTED] c/o Robert Josefsberg, Esq. PODHURST ORSECK, PA 25 W FLAGLER STREET, STE 800 MIAMI, FL 33131
83.	David Copperfield (David Seth Kokin) [REDACTED] LAS VEGAS, NV 89135
84.	[REDACTED]
85.	Michael Fisten Weston, FL
86.	Russell Adler Delray Beach, FL
87.	Marie Alessi [REDACTED] BOYTON BEACH, FL 33472
88.	Janusz Banasiak 358 EL BRILLO WAY PALM BEACH FL, 33480
89.	Beata Banasiak 358 EL BRILLO WAY PALM BEACH, FL 33480

	DESCRIPTION OF WITNESSES
90.	Juan Alessi [REDACTED] BOYTON BEACH, FL 33472
91.	[REDACTED]
92.	Jerry Goldsmith [REDACTED] WEST PALM BEACH, FL 33418-7942
93.	[REDACTED]
94.	Valdson Cotrin Address Currently Unknown
95.	[REDACTED]
96.	[REDACTED] Unknown, South Africa
97.	Glenn Dubin 1040 5TH AVE UNIT 15A NEW YORK, NY 10028-0137
98.	Abigail Wexner Three Limited Parkway Columbus, Ohio 43206
99.	Officer Munyan Palm Beach Police Department 345 South County Road Palm Beach, FL 33480
100.	Officer Minot Palm Beach Police Department 345 South County Road Palm Beach, FL 33480
101.	Sgt. Sorge Palm Beach Police Department 345 South County Road Palm Beach, FL 33480
102.	[REDACTED] S/A Witness #152
103.	Arnold Paul Prospari [REDACTED] WEST PALM BEACH, FL 33405-1654

	DESCRIPTION OF WITNESSES
104.	Joseph Pagnano [REDACTED] WEST PALM BEACH, FL 33401
105.	Stephan Kosslyn [REDACTED] CAMBRIDGE MA 02138-1802
106.	Cecile Dejongh [REDACTED] ST THOMAS VI 00802
107.	Tommy Mottola [REDACTED] PALM BEACH FL 33480-3012
108.	Mike Sanka 449 S BEVERLY DR STE 101 BEVERLY HILLS, CA 90212
109.	[REDACTED] S/A Witness #105
110.	William "Bill" Riley [REDACTED] CORAL SPRINGS FL 33076
111.	Howard Rubenstein 1345 AVENUE OF THE AMERICAS NEW YORK, NEW YORK 10105
112.	Robert Meister [REDACTED] PALM BEACH FL 33480
113.	Todd Meister [REDACTED] PALM BEACH, FL 33480
114.	President William J. Clinton
115.	William Hammond [REDACTED] Royal Palm Beach, FL
116.	Robert Roxburgh [REDACTED] West Palm Beach, Florida
117.	Michele Pagan Palm Beach Police Department 345 South County Road Palm Beach, FL 33480

	DESCRIPTION OF WITNESSES
118.	Michele Dawson Palm Beach Police Department 345 South County Road Palm Beach, FL 33480
119.	Amy Fortimer [REDACTED] WELLINGTON, FL 33414
120.	[REDACTED]
121.	[REDACTED]
122.	[REDACTED]
123.	[REDACTED]
124.	c/o Adam Horowitz FARMER, JAFFE, WEISSING, ET AL. 425 N ANDREWS AVE., SUITE 2 FT. LAUDERDALE, FL 33301
125.	[REDACTED]
126.	Zack Bryan [REDACTED] Wellington, Florida
127.	[REDACTED]
128.	Larry Morrison [REDACTED] WELLINGTON, FL 33449
129.	Story Cowles [REDACTED] WEST PALM BEACH, FL 33401
130.	Alan Dershowitz [REDACTED] CAMBRIDGE, MA 02138 or [REDACTED]

	DESCRIPTION OF WITNESSES
	██████████ NEW YORK, NY 10017. Subject to assertions of privilege
131.	Michael Dawson Palm Beach Police Department 345 South County Road Palm Beach, FL 33480
132.	Salaam Kahlid Monroe ████████████████████ CORAL GABLES, FL 33134
133.	Jelitza Negrette ████████████████████ PORTLAND, ME 04101
134.	Sergia Cordero ████████████████████ MIAMI, FL 33131
135.	Cassandra Rivera ████████████████████ WEST PALM BEACH, FL 33415
136.	Randee Speciale PALM BEACH VICTIM SERVICES 205 N DIXIE HIGHWAY # 5.1100 WEST PALM BEACH, FL 33401
137.	██████████ Address Currently Unknown
138.	Steven Hoffenberg Address Currently Unknown
139.	Michael Stroll Address Currently Unknown
140.	Douglas Shoettle 243 Riverside, Dr. New York, NY 10025
141.	Ghislaine Maxwell Address Currently Unknown
142.	Records Custodian Amazon
143.	Records Custodian Yellow Cab
144.	Records Custodian Citrix Systems, Inc.
145.	Records Custodian Federal Bureau of Investigation
146.	Records Custodian Milton Girls Juvenile Facility

	DESCRIPTION OF WITNESSES
	5770 EAST MILTON ROAD MILTON, FL
147.	Records Custodian School District of Palm Beach County 3344 FOREST HILL BLVD, SUITE C-124 West Palm Beach, FL 33406
148.	Records Custodian St. Mary's Medical Center 901 45 th STREET West Palm Beach, FL 33401
149.	Records Custodian WELLINGTON REGIONAL HOSPITAL 10104 FORREST HILL BLVD WELLINGTON, FL 33414
150.	All witnesses that Defendants have listed on their Witness List not objected to by Plaintiff, Jane Doe.
151.	All rebuttal witnesses.
152.	All People on Jeffrey Epstein's Inmate Visitor Log while he was in jail.
	<u>WITNESS TESTIMONY EXPECTED TO BE PRESENTED BY MEANS OF DEPOSITION</u>
153.	Mark Epstein 30 VANDAM STREET NEW YORK, NY 10013
154.	 c/o Alan S. Ross, Esq.
155.	
156.	Alfredo Rodriguez 11349 SW 86TH LN, Miami, FL C/O Federal Public Defender or Bureau of Prisons
157.	Scott Rothstein c/o Mark Nurik One East Broward Boulevard, Suite 700 Fort Lauderdale, Florida 33301

2. Each contested factual issue expected to be addressed by the witness, including identifying with particularity as to which element(s) of your claim for Malicious Prosecution this witness's testimony is applicable:

ANSWER: See response to number 1.

3. A detailed description of the testimony expected to be presented at trial by the witness as to each contested factual issue and element of your claim against Epstein:

ANSWER: See response to number 1.

4. A description of the Trial Exhibit List number of each exhibit expected to be introduced into evidence by the witness:

ANSWER: Unknown at this time which exhibits will be introduced through which witness.

5. A description of the Trial Exhibit List number of each exhibit introduced through other means about which the witness is expected to testify, together with a description of the witness' expected testimony regarding each exhibit:

ANSWER: Unknown at this time the exhibits about which each witness will testify.

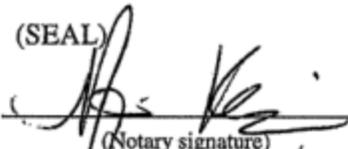
STATE OF Florida

COUNTY OF Broward

The foregoing instrument was acknowledged before me this 11th day of August, 2017 by Brad Edwards, who is personally known to me or who has produced _____ as identification and who did/did not take an oath.

X 

(SEAL)


(Notary signature)
Maria Kelljichian
(Notary name - print)

NOTARY PUBLIC, State of Florida

