

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

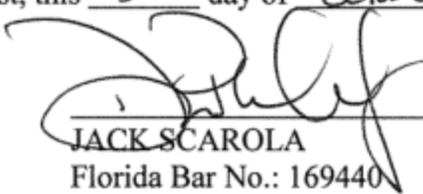
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

NOTICE OF SERVING ANSWERS TO INTERROGATORIES

Bradley J. Edwards, by and through his undersigned counsel, hereby files this Notice of Serving Answers to Interrogatories with the Court propounded by Jeffrey Epstein on September 5, 2017, and said Answers to Interrogatories have been furnished to the attorneys for Jeffrey Epstein.

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 5th day of October, 2017.



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DAMAGES INTERROGATORIES TO BRADLEY J. EDWARDS

1. State the full name, address, telephone number and description of business for each of your employers (including as an independent contractor, if applicable), at any time during the period in question, and for each employer provide the dates of employment, nature of work, title, position, salary, and description of your duties for such employer, as well as any changes in title, position or duties during your employment during the period in question, any termination thereof and the reasons for such change.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

2. State the full name, address, telephone number, type of entity (including, without limitation, corporation, partnership, limited partnership, limited liability corporation, sole proprietorship or other entity) and description of the business conducted of each business enterprise with which you have been affiliated as a principal (including as an owner, officer, director, partner, manager, member, shareholder, or in any similar capacity) at any time during the period in question, as well as the dates of such affiliation, the nature of such affiliation, any changes during the period in question in the nature of such affiliation, and the reasons for such changes, as well as any income, profits, distributions, salary, commission, or bonus paid in connection with such affiliation.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

3. State the full name, address and telephone number of all corporations, limited liability companies, partnerships, limited partnerships, limited liability corporations, sole proprietorships other entities or business enterprises for which you have served at any time during the period in question as a member of the Board of Directors, a member of the Board of Trustees, a committee member, an advisory board member, a member of senior management, or in some similar capacity, state the dates of service, describe the capacity in which you served, state the full name, address, email address and telephone number of each person to whom you reported in such capacity, and if any payment, compensation, fee, honorarium, other remuneration or other consideration was received for such service, state the nature (whether cash or other consideration), frequency, dates, and amounts thereof, and state the dates such service terminated, if applicable, and any reasons therefor.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

4. Identify each person or entity for whom you performed services for a fee amounting to \$5,000 or more, or on a contingency basis or under some other financial arrangement during the period in question, and provide the dates of service, the nature of the services performed, the terms of the business arrangement with respect to the performance of such services, the dates of any payments for such services and the amounts paid or the amounts owed for such services, and identify the person or persons to whom or which such amounts were paid or such amounts are owed. If you performed such services through a law firm, state the name of the law firm through which you performed such services in addition to the other information requested herein.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

5. At any time during the period in question did you have any interest of five (5%) percent or more in a corporation, partnership, limited partnership, limited liability company, trust or other entity, including, without limitation, professional service entities? If so, state the name and address of each such entity, the dates on which you held your interest, the dates on which you disposed of such interest, if applicable, all amounts and other consideration you paid to acquire such interest, and all amounts and consideration received, directly or indirectly, in connection with holding such interest and in connection with the disposition of such interest, and include the names, addresses and telephone numbers of all other controlling shareholders, partners, members, officers, directors, managers, settlors, trust protectors, trustees, and beneficiaries of such entity. See definition no. 5 above in preparing the response to this interrogatory with respect to any such interest acquired at any time on or after December 7, 2009 or any such interest in which there was a change in the ownership thereof at any time on or after December 7, 2009.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

6. With respect to the provision by you of legal services at any time during the period in question, for each distinct arrangement through which you provided legal services, describe in detail how you provided legal services, whether as an individual, as a sole proprietor, through a professional corporation, a professional partnership, a professional limited liability company, a professional association, or similar entity, or through a combination of any of the foregoing, and for each entity through which you provided such legal services describe in detail all agreed (whether or not followed) and *de facto* business arrangements with respect to your provision of legal services through such entity, including, without limitation, cost sharing, fee splitting, fee percentage, profit sharing and/or profit participation. If any such business arrangement was memorialized pursuant to an agreement, describe the agreement, all amendments, modifications, and supplements thereto, the dates of the same, and all parties thereto, and identify and state the names, addresses, email addresses, and telephone numbers of all persons in possession or control of embodiments of such agreement, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format). If the actual business arrangement with respect to your provision of legal services through such entity differed from any memorialized business arrangement, describe the difference and the reasons therefor.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous.

Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges

7. Identify by name, address, and telephone number, each and every domestic and foreign bank, brokerage and/or other financial institution in which there was an account maintained in your name or over which you have had signatory authority or other such control during the period in question, and provide the account number, the type of account, starting date on which you had opened such account or had signatory authority or other such control over it. For each such account provide the account balance, if any, at March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and the account balance, if any, at the present date. If the starting date of the account was a date between any two of the foregoing dates, provide the opening account balance at the starting date. See definition no. 5 above in preparing the response to this interrogatory for all such accounts opened at any time on or after December 7, 2009.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

8. Furnish the following financial information with respect to you as of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and as of the present date:

Assets	<u>Cost (\$)</u>	<u>Fair Market Value (\$)</u>
1. Cash		
2. Cash surrender value of insurance		
3. Accounts receivable		
4. Notes receivable		
5. Real estate, including fractional interests		
6. Motor Vehicles		
7. Boats and other watercraft, including fractional interests		
8. Aircraft, including fractional interests		
9. Club Memberships		
10. Interests in Trusts		
11. Partnership Interests		
12. Limited Liability Company Interests		
13. Stocks, bonds, options financial contracts or other securities		

14. Interests in Commodities
15. Pensions or annuities
16. Precious and semi-precious stones
17. Jewelry
18. Artwork
19. Antiques
20. Watches
21. Gold
22. Silver
23. Musical Instruments
24. Other collections (coins, stamps, pens, memorabilia, etc.)
25. Contracts or Agreements

b. Liabilities Face Amount (\$) Fair Market Value (\$)

1. Loans on insurance
2. Accounts payable
3. Credit balances payable
4. Leases payable
5. Notes payable
6. Mortgages
7. Accrued real estate taxes
8. Liens payable
9. Judgments
10. Reserves

See definition no. 5 above in preparing the response to this interrogatory with respect to assets and liabilities reported at December 1, 2009, August 1, 2012 and the present date. Provide separate assets and liabilities tables for each distinct form of ownership described in clauses (a), (b) and (c) of definition no. 5, and for each separate assets and liability table, identify the owner thereof.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

9. Provide the following information relating to your insurance policies in force as at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012, and as now in force:

<u>Policy No. and Description</u>	<u>Insurer</u>	<u>Policy Amount</u>	<u>Cash Surrender Value Accumulated Dividends</u>
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(1)

(2)

(3)

(4)

<u>Policy Loan No. and Description</u>	<u>Date Made</u>	<u>Automatic Premium Payments Date Made</u>
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(1)

(2)

(3)

(4)

See definition no. 5 above in preparing the response to this interrogatory at December 1, 2009 and August 1, 2012 and as now in force, and for each such reporting date provide separate tables for each distinct form of ownership described in clauses (a), (b) and (c) of definition no. 5, and for each separate table, identify the owner thereof

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

10. As at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and as at the present date, identify each account receivable and note receivable held by you, and in connection therewith set forth the name, address and telephone number of the debtor, identify the payee of each such account receivable and note receivable, and provide the amount then outstanding of each such account receivable and note receivable. See definition no. 5 above in preparing the response to this interrogatory at December 1, 2009 and August 1, 2012 and as at the present date.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

11. At any time during the period in question did you own, claim an interest in, or possess, or control, whether directly or indirectly, in your own name, through ownership by entities in which you hold an interest or control, or through trusts in which you are grantors, trustees or beneficiaries, any real property? If your answer to this interrogatory is in the affirmative, state or identify:

- (a) the dates of acquisition and disposition;
- (b) the property's address;
- (c) the type of property (i.e., house, condominium, commercial building, investment property, etc.);
- (d) the cost of the property at the time purchased;
- (e) fair market value of the property as at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012, and at the present date; if the property was disposed of or acquired in different name between any two of foregoing dates, also provide the fair market value at the time of disposition or acquisition;
- (f) if not still owned, the value of all consideration received, directly or indirectly, in connection with the disposition of the property, the transferee of the property and your relationship to the transferee;
- (g) any mortgages or other encumbrances against the property and the balance, if any, of such mortgages or other encumbrances as at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012, and at the present date; provide the dates and amounts of all increases in any such mortgages or other encumbrances at any time on or after December 1, 2009; state the amounts and dates of all mortgage payments made at any time on or after December 1, 2009 by any person or entity other than the mortgagor;
- (h) how you titled the property upon its purchase or acquisition;
- (i) in the event of any changes in the titleholder on or after December 1, 2009 in connection with which you retained beneficial ownership or effective control of the property, provide the date of such change, state the amount of any consideration paid in connection with the change, identify the new titleholder and the relationship of the new titleholder to you;
- (i) identify the current titleholder and the relationship of the current titleholder to you.
- (j) specifically identify and state all transfers of the property at any time on or after December 1, 2009 as a result of which title was held (a) in the name of Edwards' spouse, for the benefit of Edwards' spouse, in a trust under which Edwards' spouse is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards' spouse has the use, enjoyment or benefit of the same or can exercise effective control over the same, or (b) in the name of a dependent child of Edwards, for the benefit of a dependent child of Edwards, in trust under which Edwards' dependent child is a beneficiary, or in the name of any other person in circumstances under which Edwards' dependent child has the use, enjoyment or benefit of the same, or (c) in trust under which Edwards is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards has the use, enjoyment or benefit of the same or can exercise effective control over the same, state the date of the transfer, identify the new title holder, describe the amount and form of all consideration exchanged in connection with the transfer, and identify the payor and the payee of all such consideration exchanged.

See definition no. 5 above in preparing the response to this interrogatory with respect to all property which at any time on or after December 1, 2009 was acquired, or disposed of, or as to which at any time on or after December 1, 2009 title was transferred to a holder described in any of clauses (a), (b) and (c) of definition no. 5.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous.

Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

12. If at any time during the period in question you did not own the property that was occupied by your family, whether full-time or part-time, or if you do not own the property currently occupied by your family, whether full-time or part-time, set forth the name, address, email address and telephone number of the person(s) who owned or own the property, the arrangement pursuant to which your family occupied or occupies the property (e.g., lease, sub-lease, other arrangement), how such arrangement was memorialized, the amount paid for such occupancy and the frequency of such payment, the commencement date and termination date of that arrangement, and the name, address, email address and telephone number of each of the parties to that arrangement, including, without limitation, the payor of any payment made in connection with that arrangement, whether or not the payor is an actual named party to that arrangement.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

13. As at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and as at the present date, provide the following information with respect to each motor vehicle, boat, water craft, or aircraft owned or used by you as at such date, including, without limitation, in connection with any fractional ownership of any of the foregoing:

Descriptions	Cost	Date Acquired	Amount of		Owner
			Indebtedness if Pledged	Date Pledged	

(A) Motor Vehicles
(specify make,
model, VIN,
year)

(B) Boats and watercraft
(specify make,
model, SN,

(C) Aircraft
(specify make,
model, SN,
year)

(D) Fractional
Ownership Interests
(specify company,
description of fractional
interest, make,
model, SN, year)

Specifically identify and state all transfers of the foregoing property at any time on or after December 1, 2009 as a result of which title was held (a) in the name of Edwards' spouse, for the benefit of Edwards' spouse, in a trust under which Edwards' spouse is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards' spouse has the use, enjoyment or benefit of the same or can exercise effective control over the same, or (b) in the name of a dependent child of Edwards, for the benefit of a dependent child of Edwards, in trust under which Edwards' dependent child is a beneficiary, or in the name of any other person in circumstances under which Edwards' dependent child has the use, enjoyment or benefit of the same, or (c) in trust under which Edwards is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards has the use, enjoyment or benefit of the same or can exercise effective control over the same, state the date of the transfer, identify the new title holder, describe the amount and form of all consideration exchanged in connection with the transfer, and identify the payor and the payee of all such consideration exchanged.

See definition no. 5 in preparing the response to this interrogatory at December 1, 2009 and August 1, 2012 and at the present date.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

14. Set forth the following information regarding all stocks, bonds, options, other securities and other financial instruments (including, but not limited to, any interest in money markets and mutual funds), and commodities directly or indirectly owned by you or held on your behalf at each of March 1, 2009, October 1, 2009, December 1, 2009, August 1, 2012 and the present date:

Amount of

<u>Description</u>	<u>Issuer</u>	<u>Owner</u>	<u>Units</u>	<u>Record Number of Date</u>	<u>Acquired</u>	<u>Indebted.</u>	<u>Cost If Pledged</u>
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Specifically identify and state all transfers of the foregoing property at any time on or after December 1, 2009 as a result of which record title was held (a) in the name of Edwards' spouse, for the benefit of Edwards' spouse, in a trust under which Edwards' spouse is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards' spouse has the use, enjoyment or benefit of the same or can exercise effective control over the same, or (b) in the name of a dependent child of Edwards, for the benefit of a dependent child of Edwards, in trust under which Edwards' dependent child is a beneficiary, or in the name of any other person in circumstances under which Edwards' dependent child has the use, enjoyment or benefit of the same, or (c) in trust under which Edwards is a trustee or beneficiary, or in the name of any other person in circumstances under which Edwards has the use, enjoyment or benefit of the same or can exercise effective control over the same, state the date of the transfer, identify the new record title holder, describe the amount and form of all consideration exchanged in connection with the transfer, and identify the payor and the payee of all such consideration exchanged. See definition no. 5 in preparing the response to this interrogatory

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

15. Identify separately for each payor the amounts and dates of all sources of income paid to or for the benefit of you, whether directly or indirectly, for each and every year from January 1, 2009 through the present date:

- (a) salaries, wages, or commissions:
- (b) honoraria
- (c) lecture fees
- (d) board membership, committee membership, advisory board membership and other management related compensation (including stock options and stock awards)
- (e) dividends:
- (f) interest:
- (g) income from businesses/professional activities:
- (h) partnership income:
- (i) limited liability membership income
- (j) income from other investments
- (k) capital gains:
- (l) annuities and pensions:

- (m) rents and royalties:
- (n) income from estates and trusts:
- (o) disposition of commodities
- (p) disposition of personal assets.
- (q) contracts or agreements

See definition no. 5 in preparing the response to this interrogatory, and report such items separately for each distinct form of ownership in clauses (a), (b) and (c) of definition no. 5 and for each separate report, identify the owner.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

16. With respect to each of the items set forth in the preceding interrogatory, state the name, address, email address, and telephone number of the source from which the income was received (and, where applicable, provide the account numbers of the accounts in the financial institutions in which such amounts were received by or for the benefit of you).

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

17. For each direct or indirect transfer, conveyance, or other disposition by or for the benefit of you, whether for or without consideration, at any time from March 1, 2009 through the present date of any cash, assets or other items of value with a fair market value of in excess of \$5,000 provide a description of the property or asset transferred, the date of transfer, the fair market value on the date of transfer, the amount and nature of the full consideration received (if any), whether directly or indirectly, to whom the consideration was paid, and the full name, address, email address, telephone number and the relationship to you of the transferee. See definition no. 5 above in preparing your response to this interrogatory, and include in your response transfers at any time on or after December 7, 2009 by or to any of the persons listed in clauses (a), (b) and (c) of definition no. 5.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5

of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

18. At each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and at the present date, identify each interest directly or indirectly held by you or for your benefit in any Individual Retirement Accounts, Stock Option Plans, pension or profit sharing plans, or any other savings or retirement plans other than those listed in response to previous interrogatories, and include in the response to this interrogatory a description of the type, amount and fair market value of the assets held as at such date.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

19. Has a financial statement, credit application, loan application, lease application, financing application or other financial affidavit or questionnaire for you been prepared at any time during the period from March 1, 2009 through the present date? If so, state: (a) the name, address, email address and telephone number of the person or entity to whom the same was given; (b) the reason the same was prepared; (c) the date the same was prepared and submitted; and (d) the name, address, email address and telephone number of each person to whom the same was delivered and/or who currently has a copy of the same. See definition no. 5 above in preparing your response to this interrogatory, and include in your response financial statements, credit applications, loan applications, lease applications, financing applications or other financial affidavits or questionnaires prepared at any time on or after December 7, 2009 for any of the persons listed in clauses (a), (b) and (c) of definition no. 5.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

20. Identify every legal action (including, without limitation, alternative dispute resolution proceedings) in which you have been a participant, including, but not limited to, as a party or as legal counsel at any time during the period in question, including, but not limited to, the title of the action, the name of the court, the case or index number, the presiding judge, arbitrator or other officiant, the date the action was filed, a brief description of the nature of the action, and the result of the legal action (e.g. judgment for or against of a certain amount). If you participated as counsel in such legal action, state the amount of all remuneration you have received or which you are entitled to receive in connection with such participation, or if your remuneration is contingent on the outcome of such legal action or is subject to any similar arrangement and there has been no final disposition of such legal action, state in detail the terms of all agreements, understandings, and other arrangements relating to any remuneration you may be entitled to receive in connection with your participation in such legal action.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

21. As at each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and at the present date, identify every loan and advance extended to and outstanding from you, and in such identification include without limitation the name, address, email address and telephone number of the lender or identify the source of the advance, provide the date of the loan or the advance, the due dates of any installment payments, the maturity date, the principal amount, the rate of interest, the collateral or

security interest given by you, your purpose in borrowing funds, and the date and amount of each repayment. If any such loan or advance was memorialized pursuant to one or more agreements, promissory notes, or other instruments, describe each of the same, all amendments, modifications, and supplements thereto, the dates of the same, and all parties thereto, and identify and state the names, addresses, email addresses, and telephone numbers of all persons in possession or control of any and all embodiments of such agreements, promissory notes, other instruments, amendments, modifications and supplements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format). Specifically provide the dates and amounts of all increases in the outstanding principal of any such loans or advances at any time on or after December 1, 2009, and the dates and amounts of all loan and advance repayments made at any time on or after December 1, 2009 by any person or entity other than the original borrower thereunder. See definition no. 5 above in preparing your response to this interrogatory with respect to each such loan or advance, each such increase in the principal amount thereof, and each such repayment made at any time on or after December 1, 2009.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

22. At each of March 1, 2009, October 1, 2009, December 1, 2009, and August 1, 2012 and at the present date, identify all credit, debit, and/or automatic teller ("ATM") cards used by you, or controlled by you, regardless of whether such cards are titled in your name, at any time during the period in question, and for each such card, identify, state or describe the name and address of the financial institution that issued the card (i.e. VISA, MasterCard, American Express, bank, etc.), the name of the person to whom the card was issued (i.e. the name printed on the card), the card number printed on such card, the account number assigned by the financial institution for such card, the account debtor for such card and all outstanding account balances in excess of \$5,000 as of such date. See definition no. 5 above in preparing your response to this interrogatory, and include in your response all credit, debit and ATM cards issued at any time on or after December 1, 2009 to any of the persons listed in clauses (a), (b) and (c) of definition no. 5. For each such account that is open as of any time on or after December 1, 2009, specifically provide the dates and amounts of all increases in account balances in excess of \$5,000 at any time on or after December 1, 2009, and the dates and amounts of all account repayments in excess of \$5,000 made at any time on or after December 1, 2009 by any person or entity other than Bradley J. Edwards, his spouse or the account debtor.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5

of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

23. State whether at any time during the period December 1, 2009 through the present date a trust was established by you, whether directly or indirectly, as grantor or settlor:

(a) for any purpose, in whole or in part, relating to or having any effect of (i) protecting the wealth, assets, income, profits, investments, or other revenue of you or your spouse from legal claims or litigation, (ii) limiting the ability to quantify the actual value of and reducing the amounts of the personal wealth, assets, income, profits, investments or other revenue of you or your spouse, (iii) diverting assets, income, profits, investments or other revenue away from you or your spouse and to any of the persons listed in clauses (a), (b) and (c) of definition no. 5, or (iv) otherwise diverting future assets, income, profits, investments and other revenue away from you or your spouse while retaining effective control and or beneficial ownership or use thereof for yourself or herself or for the benefit of your family, and state, describe or identify:

- (a) all instruments governing the formation and administration of the trust, including the original trust agreement therefor, and all amendments, modifications, and supplements thereto;
- (b) the situs of the trust
- (c) the names, addresses, email addresses and telephone numbers of the settlors or grantors, the trustees, the trust protectors and the beneficiaries of the trust;
- (d) the assets of the trust, the locations of such assets, and the fair market value of the same at the time of creation and at each of December 1, 2009, August 1, 2012 and the present date;
- (e) the location and persons in possession or control all documents that support your answer to this interrogatory.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

24. Identify all federal, state, local and foreign income tax returns filed by or for you, and any businesses, corporations, partnerships, trusts, limited liability companies or other entities owned or controlled by you for any calendar or fiscal year falling within the period, include in such identification without limitation, a description of the return, the identity of the taxpayer for whom the return was filed, the date the return was filed, the government agency with which the return was filed, including the location, service center and address of the government agency with which such return was filed, the period for which the return was filed, the names, addresses, email addresses and telephone numbers of all persons to whom a copy of the return was delivered and/or who currently hold a copy of the return, and for each such return, identify each of source of all reported income in such return and the separate amounts derived from each such source.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

25. State, identify and describe with particularity all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format) that you and/or your law firm have had with any and all attorneys, investigators, paraprofessionals, and other contractors or individuals (including witnesses) for services provided to or for the benefit of LM, EW, Jane Doe and/or [REDACTED] at any time during the period in question, including, without limitation, engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements. Include in your response the format in which any such promises, contracts, agreements, understandings and arrangements are embodied, the names, addresses, email addresses and telephone numbers of all persons to whom such embodiments have been delivered or transmitted, the dates of such delivery or transmission, and whether to your knowledge such embodiments are in the possession or control of such persons.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

26. State, identify, and describe with particularity all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format) that you and/or your law firm have or at any time during the period in question had with any and all attorneys, investigators, paraprofessionals, and other

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contractors or individuals (including, without limitation, witnesses) for services provided to or for the benefit of you, LM, EW, Jane Doe and/or [REDACTED] in connection with this Action, or any other matters pertaining to or involving Jeffrey Epstein. Include in your response the format in which any such promises, contracts, agreements, understandings and arrangements are embodied, the names, addresses, email addresses and telephone numbers of all persons to whom such embodiments have been delivered or transmitted, the dates of such delivery or transmission, and whether to your knowledge such embodiments are in the possession or control of such persons;

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

27. State, identify, and describe with particularity all promises, contracts, agreements, understandings, and arrangements at any time during the period in question, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format) between Jack Scarola, Searcy Denney Scarola Barnhart & Shipley PA, or Boies Schiller Flexner LLP, and/or any and all attorneys, investigators, paraprofessionals, and other contractors or individuals (including, without limitation, witnesses) for services provided to or for the benefit of you in connection with this Action or any other matters pertaining to Jeffrey Epstein. Include in your response the format in which any such promises, contracts, agreements, understandings and arrangements are embodied, the names, addresses, email addresses and telephone numbers of all persons to whom such embodiments have been delivered or transmitted, the dates of such delivery or transmission, and whether to your knowledge such embodiments are in the possession or control of such persons;

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

28. State, identify, and describe with particularity all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format) that you, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services and/or any other lawyer and/or law firm have or at any time during the period in question have had with LM, EW, Jane Doe or [REDACTED] [REDACTED]) which in any way relates to allegations by LM, EW, Jane Doe or [REDACTED] [REDACTED]) against Jeffrey Epstein, including without limitation engagement letters, retainer letters, fee sharing arrangements, common interest or joint defense agreements, royalty agreements, publishing agreements, literary rights agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein. Include in your response the format in which any such promises, contracts, agreements, understandings and arrangements are embodied, the names, addresses, email addresses and telephone numbers of all persons to whom such embodiments have been delivered or transmitted, the dates of such delivery or transmission, and whether to your knowledge such embodiments are in the possession or control of such persons.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

29. State, identify, and describe with particularity all promises, contracts, agreements, understandings, and arrangements, whether written, oral or in electronic format (including, without limitation, in emails, texts or other digital or electronic format) that LM, EW, Jane Doe or [REDACTED] [REDACTED]) have or at any time during the period in question have had with publicity agents, public relations firms, book publishers, authors, literary agents, syndicators, newspaper publishers, film or television producers, news agencies, television networks, entities engaged in similar business which in any way relates to allegations by LM, EW, Jane Doe or [REDACTED] [REDACTED]) against Jeffrey Epstein, including without limitation engagement letters, retainer letters, royalty agreements, publishing agreements, literary rights agreements, agency agreements, management agreements, any other agreements relating to media rights, film rights, television rights, publishing rights, book rights, photograph rights, story rights, agency, or similar matters relating to allegations concerning Jeffrey Epstein. Include in your response the format in which any such promises, contracts, agreements, understandings and arrangements are embodied, the names, addresses, email addresses and telephone numbers of all persons to whom such embodiments have been delivered or transmitted, the dates of such delivery or transmission, and whether to your knowledge such embodiments are in the possession or control of such persons.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

30. For each payment or distribution made by you and/or your law firm, any entity with which you are affiliated, or pursuant to a joint agreement, regarding the proceeds of settlement paid by Jeffrey Epstein in connection with the settlement of claims of LM, EW, and Jane Doe against Jeffrey Epstein, state, identify, and describe the amount of payment, the date of payment, the payee, and any promises, contracts, agreements, understandings and arrangements regarding said payment, and all amendments, modifications and supplements of the same, pursuant to which such payment was made. Include in your response the aggregate amount of such proceeds of settlement for each of LM, EW, and Jane Doe retained by you and/or your law firm, the amount of such retained proceeds allocated to the reimbursement of expenses, the amount of such retained proceeds retained by your law firm as its share of any contingency fee, and the amount of such retained proceeds allocated to you as distinguished from your law firm (whether or not paid to you) as your share of the fee payable.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

Notwithstanding the foregoing objections, Counter-Plaintiff acknowledges that the following sums were paid by Jeffrey Epstein to voluntarily settle the claims of sexual molestation asserted against Jeffrey Epstein by each of the following:

L.M.	\$ 1 million
E.W.	\$ 2 million
Jane Doe	\$ 2.5 million

31. State, identify, and describe with particularity any and all trust arrangements, guardian arrangements, custodial arrangements, or similar arrangements, including accounts established by and/or for the benefit of each of LM, EW, and Jane Doe regarding the receipt, administration, and/or payment or distribution of the proceeds of settlement of claims by LM, EW, or Jane Doe against Jeffrey Epstein. Include in your response a description of the agreements, contracts and instruments, and all amendments,

modifications and supplements thereto pursuant to which such arrangements were established, the dates of the same, the names, addresses, email addresses, and telephone numbers of all settlors, grantors, trustees, guardians, custodians, other fiduciaries, and beneficiaries (including, without limitation, contingent beneficiaries) of such arrangements, the names of the account holders, the names of the authorized signatories, the account numbers and the names, addresses, telephone numbers of individual contacts of the financial institutions for all accounts established to receive and hold such proceeds of settlement.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

Notwithstanding the foregoing objections, Counter-Plaintiff acknowledges that the following sums were paid by Jeffrey Epstein to voluntarily settle the claims of sexual molestation asserted against Jeffrey Epstein by each of the following:

L.M.	\$ 1 million
E.W.	\$ 2 million
Jane Doe	\$ 2.5 million

32. Please describe in detail, quantify, and explain the financial loss, including the amount that you contend to have suffered as described in your Fourth Amended Counterclaim; to wit:

- a. injury to your reputation;
- b. mental anguish, embarrassment and anxiety;
- c. fear of physical injury to you and members of your family;
- d. the loss of the value of your time required to be diverted from your professional responsibilities;
- e. the cost of defending against Epstein's claims.

RESPONSE: Each of the listed elements of damage is presently unliquidated and will be established by the verdict of the jury empaneled to hear this case and entrusted with the responsibility to render a verdict that fully and fairly compensates Bradley Edwards for every element of damage sustained by him in the past and continues to be sustained by him in the future. As the jury will be instructed, there is no exact measure for such damages, but their verdict is required to take all evidence presented to them under consideration and to be fair, just and reasonable under the circumstances as they find them to exist.

33. Please identify with specificity the manner by which you determined that any perceived injury to your reputation, mental anguish, embarrassment and anxiety, fear of injury, and any other damage you allege to have suffered by Epstein's filing suit against you in December 2009 was attributable to the lawsuit and not to being partners with Scott Rothstein/a partner at RRA.

RESPONSE: Bradley Edwards was never partners with Scott Rothstein/a partner at RRA and consequently could not have sustained any injury attributable to a circumstance that never existed.

34. Please describe in detail and identify with specificity every social media outlet, website, blog, printed materials, seminar materials, or any other printed or published media on which you, your law firm, or any association with which you are affiliated has ever advertised, references, or otherwise places the name of Jeffrey Epstein, and include a detailed description and the date(s) of each and every such reference, advertisement, placement, publication, dissemination, or promotion, identify the persons or groups of persons to whom the same was made, and state the locations where made, and state whether or not the materials used in connection with such reference, advertisement, placement, publication, dissemination, or promotion are in your possession or control, or are still available on line or in print, and identify the persons or website from whom such materials may be obtained.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

35. Please describe with particularity any and all evidence, circumstances and events upon which you rely in asserting that your reputation was damaged as alleged in your Counterclaim, including, without limitation, specifically describing how that damage is attributable to Epstein's lawsuit against you.

RESPONSE: The allegations of Epstein's maliciously filed Complaint are defamatory per se.

36. Please explain in detail the amount of time required to be diverted from your professional responsibilities including, but not limited to, the time lost, each date on which the time was lost, the case/matter on which you would have otherwise spent the time, your billable hourly rate, if any, you allege to have lost, and for each case/matter identified, please provide the amount of income derived by you, your firm, or any entity acting on your behalf in that matter. Please detail all other evidence, methods and calculations on which you intend to rely to quantify the damages you claim are attributable to time diverted from your professional responsibilities as alleged in your Counterclaim.

RESPONSE: Time diverted from Bradley Edwards' professional responsibilities is reflected in previously produced time records and will be updated prior to the expiration of discovery. Counter-Plaintiff, however, objects to this interrogatory on the grounds that the number of interrogatories propounded by the Counter-Defendant, including subparts, substantially exceeds the maximum number permitted without leave of court.

37. For each payment or distribution made by you, Rothstein, Rosenfeldt & Alder, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services and/or any other lawyer and/or law firm to Beth Williamson in connection with any claims asserted against Jeffrey Epstein state, identify, and describe the amount of the payment, the date of payment, the source of the payment proceeds, the reasons for the payment, and any promises, contracts, agreements, understandings and arrangements regarding said payment, and all amendments, modifications and supplements of the same, pursuant to which such payment was made.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous.

Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

38. For each payment or distribution made by you, Rothstein, Rosenfeldt & Adler, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services and/or any other lawyer and/or law firm to L.M., E.W., Jane Doe, any other purported victims, any investigators, paraprofessionals, other attorneys, other contractors or individuals (including, without limitation, witnesses), and any publicity agents, public relations firms, book publishers, authors, journalists, bloggers, reporters, literary agents, syndicators, newspaper publishers, film or television producers, news agencies, television networks, or entities engaged in similar business, which payment in any way relates to claims against Jeffrey Epstein, state, identify, and describe the amount of payment, the date of payment, the source of the payment proceeds, the reasons for the payment, and any promises, contracts, agreements, understandings and arrangements regarding said payment, and all amendments, modifications and supplements of the same, pursuant to which such payment was made.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without leave of Court.

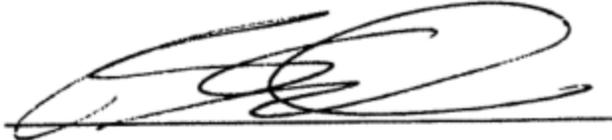
In addition, this Interrogatory seeks to invade the attorney-client and work product privileges.

39. For each receivable due at any time during the relevant period to you, Rothstein, Rosenfeldt & Adler, Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman PL and/or any other law firm through which you have provided legal services from any other lawyer and/or law firm, L.M., E.W., Jane Doe, any other purported victims, any investigators, paraprofessionals, any other contractors, and any publicity agents, public relations firms, book publishers, authors, journalists, bloggers, reporters, literary agents, syndicators, newspaper publishers, film or television producers, news agencies, television networks, or entities engaged in similar business, which receivable in any way relates to

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the instant case or any other case against Jeffrey Epstein or any other claims against Jeffrey Epstein, state, identify, and describe the amount of payment, the date of payment, the source of the payment proceeds, the reasons for the payment, and any promises, contracts, agreements, understandings and arrangements regarding said payment, and all amendments, modifications and supplements of the same, pursuant to which such payment was made.

RESPONSE: Objection: The information sought is not relevant, material or reasonably calculated to lead to the discovery of admissible evidence. The interrogatory seeks to invade the economic privacy of the Counter-Plaintiff and all others encompassed within the extraordinarily broad scope of Definition #5 of Counter-Defendant's Interrogatories. Reference to "the period in question" is vague and ambiguous. Counter-Plaintiff further objects on the grounds that the number of interrogatories propounded by the Counter-Defendant including subparts substantially exceeds the maximum number permitted without ve of Court. In addition, this Interrogatory seeks to invade the attorney-client and work product privileges. Notwithstanding the foregoing objections, Counter-Plaintiff acknowledges that the following sums were paid by Jeffrey Epstein to voluntarily settle the claims of sexual molestation asserted against Jeffrey Epstein by each of the following:



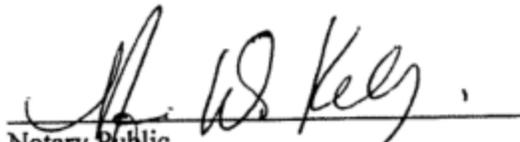
Signature of Answering Party

STATE OF)

COUNTY OF)

The foregoing instrument was acknowledged before me this 28th day of September, 2017 by Brad Edwards who is personally known to me or who has produced _____ (type of identification) as identification and who did/did not take an oath.




Notary Public
State of Florida at Large
My Commission expires:
Commission No: