

DAMAGES INTERROGATORIES TO BRAD EDWARDS

At all times used herein, the term "you," "yourself," and "your" shall refer to Brad Edwards, his spouse and each and any of his dependent children, each Trust of which any of the foregoing is trustee or holds some other controlling interest or beneficial interest, and any attorneys or agents who acted on behalf of any of the foregoing.

At all times used herein, the phrase "period in question" shall refer to January 2007 to present.

INTERROGATORIES

1. State the full name, address, telephone number and description of business of all your employers at any time during the period in question, and state the dates, nature of work, title, position and description of your duties for such employers, as well as any changes in title, position or duties during your employment or any termination thereof and the reasons for such change.

RESPONSE:

2. State the full name, address, telephone number, type of entity (including corporation, 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 and any changes during the period in question in the nature of such affiliation and the reasons for such changes.

RESPONSE:

3. State the full name, address and telephone number of all corporations, limited liability companies, partnerships or 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, the Board of Trustees, a committee member, an advisory board member or in some similar capacity, state the dates of service, describe the capacity in which you served and state the full name, address, email address and telephone number of each person to whom you reported in such capacity, and state the dates such service terminated and any reasons therefore.

RESPONSE:

4. Identify each person or entity for whom you performed services for a fee amounting to \$1,000 or more during the period in question, state the dates of service, state the nature of the services performed and state the amounts you were paid for your services or the amounts you are owed for your services. If you performed such services through a lawfirm state the name of the lawfirm through which your performed such services.

RESPONSE:

5. At any time during the period in question did you have any interest of 5% or more in a corporation, partnership, limited liability company, trust or other entity, including, without limitation, professional service entities? If so, state the name and address of each such corporation, partnership, limited liability company, trust, or other entity, the dates on which you held your interest, the dates on which you disposed of such interest, all amounts and 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.

RESPONSE:

6. With respect to the provision by you of legal services immediately prior to the commencement of this action by Epstein and in each year thereafter during the period in question, 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). Provide the same information with respect to your provision of legal services during your affiliation with Rothstein Rosenfeldt and Adler.

RESPONSE:

7. Identify by name, address and telephone number each and every domestic and foreign bank, brokerage and/or other financial institution in which at any time during the period in question there has been an account maintained in your name or over which you have had signatory authority or other such control, 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, and the monthly account balances for such account during the period in question. In addition, identify the record owner or title of the account.

RESPONSE:

7. State whether at any time during the period in question you have rented or have had access to a safety deposit box titled in your name or in any other name. If so, state the name and address of the bank or other financial institution at which the safety deposit box has been maintained, the dates and period for which it has been maintained, the name and address of the person under whose name the box is or was rented, and list and describe in detail the contents of the box as of the last date on which it was maintained or if still maintained as of the date that these interrogatories were served as set forth on the attached certificate of service. If the box is no longer maintained describe in detail what was done with the contents of the box.

RESPONSE:

8. Furnish the following financial information with respect to you as of the date immediately preceding the commencement of the instant action by Epstein, as of the first day of each calendar year thereafter during the period in question and as of the present date:

<u>Assets</u>	<u>Cost (\$)</u>	<u>Fair Market Value (\$)</u>
1. cash		
2. cash surrender value of insurance		
3. accounts receivable		
4. notes receivable		
5. merchandise inventory		
6. real estate, including fractional interests		
7. furniture and fixtures		
8. machinery and equipment		
9. Motor Vehicles		
10. Boats and other watercraft, including fractional interests		
11. Aircraft, including fractional interests		
12. Club Memberships		
13. Interests in Trusts		
14. Partnership Interests		
15. Limited Liability Company Interests		
16. stocks, bonds, options financial contracts or other securities		
17. Interests in Commodities		

- 18. pensions or annuities
- 19. Precious and semi-precious stones
- 20. Artwork
- 21. Antiques
- 22. Watches
- 23. gold
- 24. silver
- 25. jewelry
- 26. Contracts or Agreements

b. Liabilities	<u>Face Amount (\$)</u>	<u>Fair Market Value (\$)</u>
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		

7. Provide the following information relating to your insurance policies in force as of the date immediately preceding the commencement of this action by Epstein, as of the beginning of each calendar year thereafter during the period in question and as now in force:

<u>Policy No.</u>	<u>Company Name</u>	<u>Policy Amount</u>	<u>Cash Surrender Value Accumulated Dividends</u>
(1)			
(2)			
(3)			
(4)			

<u>Policy Loan</u>	<u>Date Made</u>	<u>Automatic Premium Payments Date Made</u>
(1)		
(2)		
(3)		

(4)

9. If any of the policies listed in your answer to the preceding interrogatory are assigned or pledged on indebtedness, except with insurance companies, provide the following information about each policy:

<u>Policy Number Assigned or Pledged</u>	<u>Name and Address Pledgee or Assignee</u>	<u>Amount of Indebtedness</u>	<u>Date Pledged or Assigned</u>
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(1)

(2)

(3)

(4)

10. For each account receivable, or note receivable you had immediately prior to the commencement of this Action, at the beginning of each calendar year thereafter during the period in question and as of the present date, set forth the name, address and telephone number of the debtor, and provide the amount then outstanding of each such account or note receivable.

RESPONSE:

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 at time of disposition or if still owned, the present fair market value of the property;
- (f) if not still owned, value of all consideration received, directly or indirectly, in connection with the disposition of the property
- (g) any encumbrances against the property and the balance, if any, of the encumbrance (i.e., mortgage, etc.);
- (h) how you titled the property upon its purchase or acquisition;

(i) how the property is currently titled.

RESPONSE:

12. If at any time during the period in question, you did not own the property where you were residing or currently reside, set forth the name, address, email address and telephone number of the person(s) who owned the residence, the amount of your rent, and the frequency of your rental payment.

RESPONSE:

13. If you owned or used any fixtures, furniture, machinery, equipment, motor vehicles, boats, water craft, or aircraft, including, without limitation, fractional ownership of any of the foregoing, please provide the following information both as of the date immediately preceding the commencement of this action by Epstein, the first day of each calendar year thereafter during the period in question and as of the current date:

<u>Descriptions</u>	<u>Cost</u>	<u>Liquidation Value</u>	<u>Amount of Indebtedness if Pledged</u>	<u>Dated Pledged</u>	<u>Owner</u>
(a) Furniture/fixtures (business)					
(b) Furniture (household)					
(c) Machinery/ Equipment (specify)					
(d) Trucks (specify make, model, VIN, year)					
(e) Motor Vehicles (specify make, model, VIN, year)					
(f) Boats and watercraft (specify make, model, SN, year)					
(g) Aircraft (specify make, model, SN, year)					
(h) Fractional Ownership Interests					

(specify company,
description of fractional
interest, make,
model, SN, year)

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 any time during the period in question:

<u>Description</u>	<u>Issuer</u>	<u>Record Owner</u>	<u>Number of Units</u>	<u>Date Acquired</u>	<u>Cost</u>	<u>Date Sold</u>	<u>Price</u>	<u>Amount of Indebted. If Pledged</u>
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If at any time during the period in question, you received, directly or indirectly, any dividends, distributions, interest or other payments on any stocks, bonds, options, financial instruments or other securities or commodities listed above, set forth the dates and amount received for each such payment made, and set forth the date on which each said dividend, distribution, interest payment or other payment is currently payable.

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 during the period in question:

- (a) salaries, wages, or commissions:
- (b) honoraria
- (c) lecture fees
- (d) board membership, committee membership and advisory board membership 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

RESPONSE:

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:

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 during the period in question of any cash, assets or other items of value with a fair market value of in excess of \$1,000 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.

RESPONSE:

18. At any time during the period in question, have you had any life interest or remainder interest, either vested or contingent, in any trust or estate, or have you been a beneficiary of any trust? If so, for each such life interest, remainder interest, and interest as a beneficiary ("Interest"), please state the name of the trust or estate, the fair market value of the assets in the trust or the estate as of the latter of the date of creation of such Interest or the date of commencement of this Action by Epstein, the present fair market value of the assets in the trust or the estate, the fair market value of such Interest as of the latter of the date of its creation and the date of commencement of this Action by Epstein, the present fair market value of such Interest, and the amounts, payee and dates of payment of each such distribution made during the period in question to or for the benefit of you in respect of each such Interest.

19. At any time during the period in question have you directly or indirectly held an interest 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. If your answer is yes, state the name, address, email address and telephone number of the custodian of all such assets, state the amounts thereof as of both the latter of the date of creation and the date of the commencement of this Action by Epstein and the present date.

RESPONSE:

20. At any time during the period in question have you held any other assets or an interest in assets, either actual or contingent, other than those listed in the previous interrogatory requests (i.e., stamp collections, coin collections, musical instruments, etc.)? If so, please describe the assets in detail, provide the date of acquisition, identify the location of the asset, state the fair market value as of the later of the date of acquisition and the date of the commencement of this Action by Epstein, state the current fair market value of each such asset, state the date disposition, if applicable, and if so, identify the nature and amount of the consideration received, whether directly or indirectly, in connection with such disposition, and the payee of such consideration.

RESPONSE:

21. 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 in question? If so, state: (a) 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 and telephone number of all persons to whom the same was delivered and/or who currently have a copy of the same.

RESPONSE:

22. Identify every legal action in which you have been a party at any time during the period in question, including, but not limited to the title of the action, the name of the court, the docket number or 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).

RESPONSE:

23. Identify every loan made to or for the benefit of you at any time during the period in question or any loan to you that was outstanding at any time during the period in question, and in such identification include without limitation the name of the lender, the date of the loan, the maturity dates, the principal amount, the rate of interest, the collateral or security interest given by you, your purpose in borrowing funds, and date and amount of each repayment.

RESPONSE:

24. 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, and the account number assigned by the financial institution for such card.

RESPONSE:

25. State whether at any time during the period in question a trust was established for any purpose by you, whether directly or indirectly, as grantor or settlor 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 and addresses of the trustees, trust protectors and the beneficiaries of the trust;

(d) the assets of the trust and the locations of such assets;

(d) the location and persons in possession or control all documents that support your answer to this interrogatory.

RESPONSE:

26. State whether you currently have a last will and testament and identify all previous versions of your will signed at any time during the period in question?

RESPONSE:

27. Identify all federal, state, local and foreign tax returns filed 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 in question, including, without limitation, income tax returns, gift tax returns, sales tax returns, use tax returns, wealth tax returns, payroll returns, Forms 1099, FATCA returns, transfer tax returns, and any other tax returns and 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 holds a copy of the return:

RESPONSE:

28. State, identify and describe 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 lawfirm 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 and/or Jane Doe 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:

29. State, identify and describe 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 lawfirm have or at any time during the period in question have had with 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, LM, EW and/or Jane Doe in connection with this Action, [the CVRA 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:

29. State, identify and describe 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, on the one hand and 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, [the CVRA 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:

30. State, identify and describe 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 lawfirm through which you have provided legal services and/or any other lawyer and/or lawfirm have or at any time during the period in question have had with LM, EW or Jane Doe which in any way relates to allegations by LM, EW or Jane Doe 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:

31. For each payment or distribution made by you and/or your lawfirm in respect of 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, and all amendments, modifications and supplements of the same, pursuant to which such payment was made. Including in your response a the aggregate amount of such proceeds of settlement for each of LM, EW and Jane Doe retained by you and/or your lawfirm, the amount of such retained proceeds allocated to the reimbursement of expenses, the amount of such retained proceeds retained by your lawfirm as its share of any contingency fee, and the amount of such retain proceeds allocated to you as distinguished from your lawfirm (whether or not paid to you) as your share of the fee payable.

RESPONSE:

32. State, identify and describe any and all trust arrangements, guardian arrangements, custodial arrangements or similar arrangements and accounts established by and/or for the benefit of each of LM, EW and Jane Doe in respect of 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, and 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: