

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
NOTICE OF NO OBJECTION TO ATTORNEY PAUL CASSELL, ON BEHALF OF
L.M., E.W. AND JANE DOE, OR DEFENDANT/COUNTER-PLAINTIFF BRADLEY J.
EDWARDS MOVING TO SEAL COURT RECORDS UNTIL THE COURT MAKES A
DETERMINATION ON HOW THE DOCUMENTS SHALL BE TREATED**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") gives notice that, in light of the parties' differing views over the potentially privileged nature of the documents attached to Epstein's Appendix in Support of his Response in Opposition to Defendant/Counter-Plaintiff Bradley J. Edwards' ("Edwards") Second Supplement to Motion in Limine Addressing the Scope of Admissible Evidence, Epstein will not oppose Paul Cassell or Edwards filing a Motion seeking to seal the documents in accordance with the requirements of Administrative Order 2.303-0/09 until such time as the Court has made a determination on Epstein's Motion for Court to Declare Relevant and Non-Privileged Nature of Documents, and Request for Additional Limited Discovery, Evidentiary Hearing and Appointment of Special Master. Paul Cassell, who has appeared on behalf of E.W., L.M. and Jane Doe, has requested that the documents be sealed to protect his clients' interests, however, his clients' names were redacted from the Court filing.

Edwards' counsel's assertion that Epstein's current counsel obtained the documents in some inappropriate or unethical way is completely without merit. Epstein has already notified Edwards' counsel and Cassell that if they will identify by Bates number the documents they assert are attorney-client communications, Epstein will segregate and seal those documents. Lastly, Epstein wants the Court to understand that his agreement to not object is not based on any doubt in his position that the documents on the disc were produced many years ago and that the disc contains relevant and highly material e-mails that Epstein believes are case ending. Because the disc was also produced to William Scherer in the *Razorback* litigation and because some of the documents they claim were not to be produced were attached as exhibits to Edwards' deposition in 2013, any work product protection has long ago been waived.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on March 6, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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By: /s/
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