

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

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

**ORDER GRANTING MOTION TO PERMIT BRADLEY J. EDWARDS TO TAKE THE
LIMITED DEPOSITION OF JEFFREY EPSTEIN**

THIS CAUSE having come before the Court for hearing on May 23, 2018, upon Bradley J. Edwards' ("Edwards") Motion to Permit Bradley J. Edwards to Take the Limited Deposition of Jeffrey Epstein, and the Court, having reviewed the file, considered the arguments of counsel, and being fully advised in the premises, it is hereby ORDERED and ADJUDGED that the Motion is **GRANTED** as stated on the record and summarized as follows:

Edwards may take the limited deposition of Jeffrey Epstein ("Epstein") regarding the 49 exhibits identified on Epstein's Clerk's Trial Exhibit List which Edwards claims are privileged. The Court recognizes that no judge has made a determination that the exhibits are, in fact, privileged and that Epstein has requested an *in camera* inspection of them. Epstein's deposition shall be limited to the following topics:

1. Whether and to what extent Epstein reviewed any of the 49 exhibits prior to March 2018;

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2. Whether and to what extent Epstein reviewed any of the 49 exhibits after March 2018;
3. Whether Epstein has any knowledge regarding compliance with the Court's verbal rulings on the record at the March 8, 2018, hearing concerning destruction of those documents Edwards has claimed are privileged;
4. Whether and to what extent Epstein has shared any of the 49 exhibits with anyone other than his attorneys and their staff; and
5. Which, if any, of the alleged 49 exhibits Epstein plans to testify about at trial. Epstein may avoid questions on this topic if there is a stipulation on the record that he is not testifying at the upcoming trial or, if testifying, not planning on testifying about any of the 49 exhibits.

Epstein's deposition shall be conducted in this matter at the same time his deposition is conducted in the bankruptcy proceeding. Epstein's counsel may assert objections, as appropriate, including attorney-client privilege, work product and Fifth Amendment objections. Epstein's answering of any specific question as ordered, however, will not be raised or relied upon in this matter or any other by Edwards or any Intervenors, nor construed by this Court, as a waiver of his attorney-client privilege, work product or his Fifth, Sixth and Fourteenth Amendment Rights as guaranteed by the United States Constitution and Article I, Sections 2, 9 and 16 of the Florida Constitution with respect to any other question asked of him or to any subject matter relating to any answers Epstein may provide at this deposition.

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DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, this _____
day of _____, 2018.

THE HONORABLE DONALD W. HAFELE
CIRCUIT COURT JUDGE

Copies have been furnished to all counsel on the attached counsel list.

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