

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 Epstein's possession of Edwards' alleged privileged materials **originating from the disc that is the subject of the Bankruptcy proceeding** (the "alleged privileged materials"), some of which were identified by Epstein as exhibits on his Clerk's Trial Exhibit List. **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. (5/23/18 Tr. 13:9-23.)** Epstein's deposition shall be limited to the following topics:

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1. Whether and to what extent Epstein reviewed any of the alleged privileged materials prior to March 2018 (5/23/18 Tr. 19:7-12);
2. Whether and to what extent Epstein reviewed any of the alleged privileged materials after March 2018 (5/23/18 Tr. 19:7-12);
3. Whether Epstein has any knowledge regarding compliance with the Court's verbal rulings on the record at the March 8, 2018, hearing regarding destruction of those documents Edwards has claimed are privileged (5/23/18 Tr. 19:13-18);
4. Whether and to what extent Epstein has shared any of the alleged privileged materials with anyone other than his attorneys (5/23/18 Tr. 19:19-22); and
5. Which, if any, of the alleged privileged materials Epstein plans to use to testify at trial. Epstein may avoid questions on this topic if there is a stipulation on the record that he is not testifying at trial (5/23/18 Tr. 19:22-20:2).

Epstein's deposition shall be conducted in this matter on the same date his deposition is conducted in the bankruptcy proceeding. Epstein's deposition shall first be conducted in the bankruptcy proceeding and then, immediately following, will be conducted in this matter.

Epstein's counsel may assert objections, as appropriate, including, but not limited to, attorney-client privilege, work product and Fifth Amendment objections. Epstein's answering of any question, however, will not be raised or relied upon in this matter or any other by Edwards or any Intervenors, or any other person or entity, nor will it be construed by this Court, or any other court, as a waiver of Epstein's attorney-client privilege, work product protections or Fifth, Sixth and Fourteenth Amendment Rights as guaranteed by the United States Constitution and Article I,

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Sections 2, 9 and 16 of the Florida Constitution, whether in this or any other proceeding, with respect to any question asked of him or to any subject matter relating to any answers Epstein may provide at this deposition.

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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