

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
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IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.
_____ /

**INTERVENORS L.M., E.W., AND JANE DOE'S LIST OF REQUESTED RELIEF
SOUGHT IN THIS CASE**

Intervenors L.M., E.W., and "Jane Doe" (hereinafter "the Victims"), proceeding pseudonymously, having previously been allowed to intervene in this action, and having participated in the Court's hearing on April 13, 2018, now file this list of requested relief.

In the April 13, 2018, hearing, the Court directed the Victims to file – separately and on their own behalves – a list of the requested relief they are seeking in this case. The Victims now file that list.

The victims seek the following relief:

1. Fowler White and Epstein (including all of Epstein's past and present legal counsel) will provide to the Victims' counsel, within seven days of the Court's order, a listing of all persons or entities to whom the subject documents (or any information derived from the contents of the subject documents) have been viewed or distributed, as well as a certification that they have asked for return of the subject materials.

2. A letter written and signed by both Fowler White and Jeffrey Epstein, and sent to all persons known or suspected to have reviewed or obtained any copies of the documents at issue, to the following effect: "To Whom It May Concern: Certain Documents with which you were provided were impermissibly retained by the undersigned in violation of an order from U.S.

Bankruptcy Judge Raymond B. Ray of the Bankruptcy Court for the Southern District of Florida. *See* DE 1194, *In Re: Rothstein Rosenfeldt Adler, P.A.*, No. 09-34791-RBR. If you are in possession of any of the attached documents as a consequence of a violation of the order, you are requested to promptly return it to the attorney who has provided a copy of this letter to you.” Fowler White and Epstein must also provide counsel for the victims with a comprehensive list of persons who are receiving this letter.

3. Discovery regarding the distribution of the impermissible retained materials, in the form of twenty interrogatories, twenty requests for production, and twenty requests for admission, to be answered by: (1) Jeffrey Epstein; (2) any attorney, paralegal, other law firm employee or consultant, or expert witness who has been involved in the representation of Epstein in the above-captioned matter or in *Epstein v. Edwards*, No. 502009CA040800XXXXMBAG (Cir. Ct. of the 15th Jud. Cir. for Palm Beach County, Fla.), and in addition deposition testimony of all persons reasonably believed to have knowledge of the circumstances surrounding the copying, retention, or dissemination of the documents at issue in DE 1194, beginning with those depositions so Ordered previously by this Court in DE 6366.

4. Separate letters of apology for each of the three victims, written by Epstein and all attorneys and staff found to have played a responsible role in the unauthorized retention and release of their privileged materials.

5. A referral from this Court to appropriate disciplinary authorities, including bar authorities, for any attorney found to have apparently violated ethical obligations in connection with the improper retention and subsequent distribution of the materials at issue.

6. Monetary remedies and sanctions, payable directly to each of the three victims by Epstein, in the amount of not less than \$25,000 for each of the three victims (a total of \$75,000).

After making payment, Epstein is permitted to seek reimbursement from any of his attorneys who may have been responsible. The remedies shall serve as liquidated damages for all the losses they have suffered as a consequence of the release of the materials at issue.

7. On order to show caused, directed to Fowler White and Epstein, to show cause as to why they should not be held in contempt of the Court's order [DE 1194], to be followed by an evidentiary hearing on the circumstances surrounding the violation of the victims' right of confidentiality, and a finding of civil or criminal contempt as may be appropriate, along with such additional sanctions as the Court may then find to be appropriate.

8. Reasonable attorneys' fees for the three victims for all attorney time, costs, and expenses.

9. Such other sanctions or remedies as the Court may find just and proper.

CONCLUSION

The Court should grant the three Victims' the relief requested above, including joinder in Farmer Jaffe's motion for sanctions and their own sanctions and other relief, for reasons as described in DE 6345 and DE 6357, as well as Farmer Jaffe's related pleadings.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically to all registered users on the CM/ECF system, which includes counsel identified on the service list below, on this 4th day of May, 2018.

I HEREBY CERTIFY that the undersigned attorney is appearing pro hac vice in this matter pursuant to court order dated May 4, 2018.

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imply institutional endorsement)

By: /s/ Paul G. Cassell
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Pro Hac Vice

-AND -

I HEREBY CERTIFY that I am admitted to the Bar of the United State District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

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