

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

CASE NO.: 2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually, and  
[REDACTED], individually,

Defendant.

\_\_\_\_\_ /

**RE-NOTICE OF TAKING VIDEO DEPOSITION DUCES TECUM**

TO: All counsel on the attached Counsel List

PLEASE TAKE NOTICE that the undersigned attorneys will take the Video Deposition Duces

Tecum of:

**NAME AND ADDRESS**

**DATE AND TIME**

**LOCATION**

Jeffrey Epstein

August 17, 2018 at  
3:00 p.m. or immediately  
following the video  
deposition duces tecum of  
Jeffrey Epstein in the In Re:  
Rothstein Rosenfeldt Adler,  
P.A. USDC Bankruptcy  
Court matter scheduled for  
August 17, 2018 at 1:00 [REDACTED].

Searcy Denney Scarola  
Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes  
Boulevard  
West Palm Beach, FL 33409  
[REDACTED]

**Videographer: Above & Beyond Reprographics, Inc.**

**\*DUCES TECUM: TO HAVE AND BRING WITH YOU AT THE TIME OF THE DEPOSITION THE FOLLOWING:**

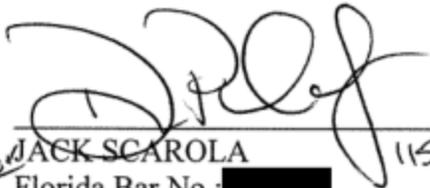
**DUCES TECUM\***

All communications and all records relating to all communications concerning or containing information derived from documents or data over which a claim of privilege was asserted by or on behalf of Bradley J. Edwards.

upon oral examination before Palm Beach Reporting, Inc., a Notary Public; or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 20 day of July, 2018.

  
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cc: Palm Beach Reporting (Court Reporter)  
Above & Beyond Reprographics, Inc. (Videographer)

**E-TRANSCRIPT, ASCII, CD AND/OR DVD REQUESTED**

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**“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Americans with Disabilities Act Coordinator at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”**

**“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Americans with Disabilities Act Coordinator por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”**

**“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte Americans with Disabilities Act Coordinator nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”**