

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

v.

BRADLEY J. EDWARDS, et al.,

JUDGE: HAFELE

Defendants/Counter-Plaintiff.

**JEFFREY EPSTEIN'S RESPONSE TO BRADLEY EDWARDS'S MOTION TO
COMPEL RESPONSES TO INTERROGATORIES**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to this Court's ruling in open court on September 15, 2017, hereby files his Response to Defendant/Counter-Plaintiff Bradley Edwards's ("Edwards") Motion to Compel as follows:

In response to Edwards's "updated" Net Worth Interrogatories, Epstein asserted his Fifth Amendment Privilege to some of the Interrogatories, just as he did to Edwards's Initial Net Worth Interrogatories with which he was served in 2013. Epstein also answered the direct question regarding his net worth by offering to stipulate to a net worth of one hundred million dollars. Nevertheless, and notwithstanding that Edwards conceded that this assertion of the Fifth Amendment was legally permissible and acceptable at a hearing in 2013¹ on the exact issue, Edwards now claims, without any legal basis in the law, that "the objections are not well-

¹ See *Transcript of hearing held before Judge Crow on Monday, September 16, 2013* on this issue, attached hereto as "Exhibit A."

taken and should be overruled.” See *Edwards’s Motion to Compel*.

“[N]ot well taken” is not a legal basis upon which this Court can rule. Additionally, Edwards provides no law to stand for the proposition that this Court can overrule Epstein’s assertion of his Fifth Amendment Privilege. However, as Edwards is aware, Epstein asserts his Fifth Amendment Privilege to any questions related to his net worth solely because of actions taken by Edwards. As stated in his responses to the Interrogatories at issue, Epstein’s “concern is in part derived from the continued efforts utilized by Edwards in the case of *Doe v United States* (“the CVRA case”).” In the CVRA case Edwards, through his clients, is seeking to rescind Mr. Epstein’s non-prosecution agreement with the United States for the Southern District of Florida (“NPA”). In pleadings and sworn deposition testimony in this case, the CVRA case, other litigations, and to the press, Edwards has made it known that causing criminal prosecution of Mr. Epstein is a primary objective of his pending litigation in the CVRA case. Indeed, in this case, even a cursory review of Edwards’s witness and exhibit list make it readily apparent that he seeking to make this case not about Malicious Prosecution, but rather about underlying criminal allegations and civil cases that have settled, that have no bearing on Edwards’s cause of action.

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