

SEARCY
DENNEY
SCAROLA
BARNHART
& SHIPLEY PA

*Attorneys
at Law*

WEST PALM BEACH OFFICE:

2139 PALM BEACH LAKES BLVD
WEST PALM BEACH, FLORIDA 33409

P.O. BOX 3626
WEST PALM BEACH, FLORIDA 33402

Spanish

TALLAHASSEE OFFICE:

THE TOWLE HOUSE
517 NORTH CALHOUN STREET
TALLAHASSEE, FL 32301-1231

VIA EMAIL

September 19, 2017

Robert D. Critton, Esquire
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

Re: EDWARDS ADV. EPSTEIN
Our File No.: 291874

Dear Bob:

A list of trial witnesses has been filed in the referenced matter suggesting Epstein's intent to waive attorney-client privilege in defense of the malicious prosecution claim pending against him and which is scheduled for trial beginning December 5, 2017. We are noticing your deposition to obtain discovery concerning any possible claim that Epstein relied upon your legal advice in suing Brad Edwards.

While we have unilaterally set the date for your deposition, we will work with you to reschedule the date to minimize inconvenience to you to the extent you can be accommodated within our discovery deadlines.

Thank you for your anticipated cooperation, and call if you have any questions.

Sincerely,

JACK SCAROLA
JS/mm
Enc.

cc: Bradley J. Edwards, Esq.

ATTORNEYS AT LAW:

ROSALYN SIA BAKER-BARNES

*F. GREGORY BARNHART

T. HARDEE BASS, III

LAURIE J. BRIGGS

*BRIAN R. DENNEY

BRENDA S. FULMER

*MARIANO GARCIA

*JAMES W. GUSTAFSON, JR.

MARA R. P. HATFIELD

ADAM S. HECHT

JACK P. HILL

KELLY HYMAN⁷

CAMERON M. KENNEDY

MICHAEL H. KUGLER

ANDREA A. LEWIS

DARRYL L. LEWIS¹

PABLO PERHACS^{2,5}

EDWARD V. RICCI

*JOHN SCAROLA

MATTHEW K. SCHWENCKE

CARTER W. SCOTT

*CHRISTIAN D. SEARCY

CHRISTOPHER K. SPEED^{6,7}

*KAREN E. TERRY

DAVID P. VITALE, JR.

DONALD J. WARD III⁸

*C. CALVIN WARRINER III

OF COUNSEL:

*EARL L. DENNEY, JR.²

*JOHN A. SHIPLEY III

DAVID K. KELLEY, JR.

WILLIAM B. KING⁴

SHAREHOLDERS

*BOARD CERTIFIED

ALSO ADMITTED

¹ KENTUCKY

² MISSISSIPPI

³ MONTANA

⁴ NEW JERSEY

⁵ NEW YORK

⁶ VIRGINIA

⁷ WASHINGTON DC

PARALEGALS:

VIVIAN AVAN-TEJEDA

NICHOLAS F. DeBELLIS

RANDY M. DUFRESNE

JOHN C. HOPKINS

VINCENT L. LEONARD, JR.

ROBERT W. PITCHER

CHRIS R. RODGERS

KATHLEEN SIMON

STEVE M. SMITH

BONNIE S. STARK

WALTER A. STEIN



WWW.SEARCYLAW.COM

EFTA00809615