

**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 [REDACTED], [REDACTED], AND [REDACTED] SUMMARY OF DAMAGES

Intervenors [REDACTED], [REDACTED], and “[REDACTED]” (hereinafter “the Victims”), proceeding pseudonymously, having previously been allowed to intervene in this action, and having participated in the Court’s hearings on these matters, and pursuant to this Court’s order of August 16, 2018, denying Epstein’s motion to strike the victims’ previously filed list of requested relief (DE 6427), now file this summary of their damages.

The factual background related to this case has been summarized in previous documents, filed by the victims, Bradley J. Edwards, and the Farmer Jaffe law firm. *See, e.g.*, DE 6382, 6393, 6427. To avoid duplicative filings, the victims simply adopt by reference the factual background in their earlier-filed list of requested relief (DE 6393) as if set forth in full herein, as well as the factual background set forth in the earlier-referenced documents filed by Edwards and Farmer Jaffe.

The victims now provide this summary of their damages, reserving their right to amend this summary as events develop and discovery proceeds in this case:

1. Significant emotional distress damages, caused to the victims by the conduct of Epstein and his attorneys in violating this Court’s order – e.g., by improperly retaining a copy of the victims’ confidential materials and subsequently improperly distributing these materials. Epstein

and his counsel have caused significant emotional distress to the victims though (among other things) creating fear about how he might use these documents and to whom he might distribute these documents. This distress was compounded by Epstein's sexual abuse of the victims and his subsequent history of abusive and harassing litigation tactics directed towards them.

2. Attorneys' fees and related costs and expenses incurred in course of responding to the improper action of Epstein and his attorneys.

3. All damages previously listed in the victims' list of requested relief (DE 6393).

The victims request that the Court take all steps within its power to compensate the victims for the damages they have suffered, including but not limited to granting their requested relief (DE 6393), and impose such other sanctions against Epstein and his attorneys as the Court may find just and proper.

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 21st day of August, 2018.

I HEREBY CERTIFY that the undersigned attorney is appearing pro hac vice in this matter pursuant to court order dated this 21st day of August, 2018.

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(above for address/contact purposes only, not to
imply institutional endorsement)

By: /s/ Paul G. Cassell
Paul G. Cassell (Utah Bar No. [REDACTED])
[REDACTED]
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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