

From: Tonja Haddad Coleman <[REDACTED]>
To: Jack Scarola <[REDACTED]>
CC: "Mary E. Pirrotta" <[REDACTED]>, Brad Edwards <[REDACTED]>, Maria Kelljchian <[REDACTED]>
Subject: Re: Joint Pretrial Stipulation (revised 9.27.13) for final review and approval for filing Edwards, Bradley adv. Epstein (File #: 291874)
Date: Fri, 27 Sep 2013 20:32:48 +0000

I have Brad's business card and documents that say otherwise, but we can agree to disagree. Here are the only facts to which I will stipulate-

1. My client plead guilty to a felony that had nothing to do with any of Brad's clients;
2. Brad was a partner at RRA when it was conducting the largest Ponzi scheme in Florida history;
3. Brad's partner is serving 50 years for the Ponzi scheme.

You can try to prove everything else at trial.

Please send a final copy before filing.

Sent from my iPhone

On Sep 27, 2013, at 4:21 PM, "Jack Scarola" <[REDACTED]> wrote:

Brad was never a partner and we will not stipulate that he was. We will agree to disagree, except that we will eliminate the statement of facts to be read to the jury which I am also sure we will never agree upon. Consequently, having been fully informed of our position on each of the proposed stipulated facts, tell us which you agree to, and we will simply delete the rest. It will be a waste of time for you to try to reinsert anything we have already rejected, so please don't try.

Sent from my iPad

On Sep 27, 2013, at 2:44 PM, "Tonja Haddad Coleman" <[REDACTED]> wrote:

There were several changes made to which we do not agree; to wit:
The additions in the stipulated facts to paragraphs a and b; in e put back in that Edwards was a partner at RRA- not just working there; we disagree with g in its entirety; add "partner" back into j; and what is showing as a new j makes no sense as drafted- as if words were deleted and it was not reviewed.
Additionally, as I stated yesterday, the court order does not require a statement of facts to be read to the jury so they should be deleted.
Thank you.

Sent from my iPhone

On Sep 27, 2013, at 1:20 PM, "Mary E. Pirrotta" <[REDACTED]> wrote:

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<Pretrial Stipulation 9.27.13 (revised 1 p.m.).docx>

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