

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

IN RE:

ROTHSTEIN ROSENFELDT
ADLER, P.A.

Debtor.

CASE NO. 09-34791-BKC-RBR
CHAPTER 11

MOTION FOR SANCTIONS

The Movant, Jeffrey Epstein, ("Esptein") by and through his undersigned representative and pursuant to the Federal Rule of Civil Procedure 37, moves this Court to impose sanctions relating to a subpoena served on the bankruptcy trustee in the above matter. The grounds for his motion are as follows:

I. FACTUAL BACKGROUND

- A. On April 16, 2010, ten months ago, Epstein's counsel issued a subpoena to be served on the trustee for Rosenstein Rosenfeldt & Adler, P.A. ("RRA") for records relating to his claims against Scott Rothstein, and Bradley J. Edwards. A copy of the subpoena is attached as Exhibit "1".
- B. No objection either in state or Bankruptcy Court, to the issuance of this subpoena or scope was ever made by counsel for Rothstein or Edwards, prior to this Court determining its jurisdiction on May 18, 2010. In fact, counsel for Edwards requested copies of the records on April 27, 2010, a week after it was issued. A copy of the Request by Edwards' counsel for records is attached as Exhibit "2".
- C. On May 18, 2010, this Court granted the trustee's motion seeking a protective order and establishing production protocol for all records subpoenaed by any party or requested from the trustee for RRA. (D.E. 672) A copy of that Order is attached as Exhibit "3".

Among other things, this Order provided that it was:

"To govern any demand subpoena or request for production of RA's electronically stored documents".

In addition the "court retained jurisdiction with respect to all matters arising from or relating to the implementation or interpretation to this Order".

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- D. On July 14, 2010, Epstein filed a Motion to Compel Production of Documents previously subpoenaed from the trustee. (D.E. 807)
- E. On July 19, 2010, [REDACTED], a client of Bradley J. Edwards and the former firm of RRA filed a Motion for Protective Order requesting protection on the grounds that *all* of the documents subject to the subpoena were protected by attorney-client work product privilege. The motion also sought to prevent production of any document even though the subpoena on its face asked for records which were clearly not the subject of a privilege. (D.E. 818)
- F. An Amended Motion for Protective Order was filed on behalf of [REDACTED] on July 19, 2010 essentially asserting the same grounds. (D.E. 819)
- G. On August 4, 2010, this Court conducted a hearing on all of the aforesaid motions and entered an order on August 13, 2010 appointing a special master, requiring the special master to obtain the documents and prepare a privilege log and to determine the applicability of a claimed privilege. (D.E. 888) A copy of this Order is attached as Exhibit "4".
- H. On September 20, 2010, the Special Master, the Honorable Robert Carney, filed a Motion to Clarify seeking among other things assistance from the Farmer Jaffee firm to assist in the preparation of the Privilege Log. (D.E. 1013)
- I. On September 27, 2010, prior to the hearing on the Special Master's Motion for Clarification, another Motion for Protective Order was filed by Bradley J. Edwards now the third such motion seeking protection from the documents requested. (D.E. 1022)
- J. On October 13, 2010, this court conducted a hearing on the Motion for Clarification and the Motion for Protective Order. On October 15, 2010 the Court entered another order granting the Motion for Clarification which allowed the privilege log to be prepared by Farmer Jaffee, and required that it be done within thirty (30) days of the Order, i.e. on or before November 14, 2010. (D.E. 1120) A copy of the Order is attached as Exhibit "5".
- K. On November 2, 2010, [REDACTED] and Edwards filed another Motion asking Jeffrey Epstein to pay the costs of bate-stamping and production of the records needed for the preparation of the privilege log. (D.E. 1120) An Agreed Order was entered on November 30, 2010 whereby Fowler White would bate-stamp and copy the records needed to be copied from the privilege log which initially was represented to be 74,000 documents but instead was only 24,000. (D.E. 1194) That order also gave Farmer Jaffee an extension of time to prepare a log on emails by December 15, 2010 with the balance of the log due December 30, 2010. A copy of the Order is attached as Exhibit "6".

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- L. On December 16, 2010, █████ sought an emergency hearing and a stay of the Court's Order directing the privilege log. (D.E. 1236) That motion alleged that before a privilege log should be prepared, the Motion for Summary Judgment presently pending before Judge Crow should be heard, which was filed on September 22, 2010. Clearly this requested relief to stay pending the Motion for Summary Judgment could have been raised earlier. In addition, Edwards advised the court that they had filed a Motion to Stay the issuance of the subpoena in state court (D.E. 1197) pending the Motion for Summary Judgment hearing. On December 22, 2010, the court granted an enlargement of time of up to January 31, 2011 for the preparation of the privilege log. (D.E. 1260) A copy of that Order is attached as Exhibit "7".
- M. On January 11, 2011, Judge Crow entered an Order Denying Edwards' Motion for Summary Judgment citing among other grounds the need for continued discovery including the preparation of the privilege log and the in-camera review of such documents. A copy of that Order is attached as Exhibit "8".
- N. On January 31, 2011, Judge Crow denied the Motion to Stay the issuance of the subpoena and the preparation of the privilege log, and decline to interfere with this Court's Orders requiring a privilege log. A copy of that Order is attached as Exhibit "9".
- O. On or about January 26, 2011, Farmer, Jaffee and Edwards served what they claimed to be a privilege log. To date, it has not been filed with this Court. A copy of the Privilege Log is attached as Exhibit "10". Clearly the privilege log does not comport with the requirements of Federal and State law for the preparation of a privilege log. *See: TIG Insurance Corporation of America*, 799 So. 2d 339, (Fla. 4th DCA 2001) and cases cited therein.

II. ARGUMENT

Within one month of the issuance of the subpoena by Epstein for records from the trustee, this Court entered an order determining the document production protocol for records to be produced by subpoena or other means from the trustee of RRA's electronically stored information. No intervening motion relating to the scope or subject matter of the subpoena were filed by Edwards prior to this Court assuming jurisdiction. Since any and all motions for protective order filed on behalf of █████, Edwards, Farmer Jaffee ("Edwards, et al.") relating to the subpoena have been filed after the entry of this order and before this Court, this Court has

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jurisdiction over all matters relating to the Trustee's obligations to produce records. *In re: American Southern Pub. Co.*, 426 F. 2d 160, 163 (C.A. Ala. 1970). (bankruptcy courts have summary jurisdiction to adjudicate controversies relating to property over which they have actual or constructive possession).

Since Epstein's Motion to Compel was heard on August 4, 2010, this Court has entered no less than four (4) orders directing Edwards, et al. to prepare a privilege log. Further, as the record demonstrates, each time a deadline was coming up to produce the log, additional motions for protective order or stay were filed and heard by this court. Edwards, et al. further sought to delay the preparation of a privilege log pending a ruling by the state court on a motion for summary judgment, which has been denied.

It was not until November 30, 2010 that Edwards filed a motion to challenge the subpoena in state court. Notice of this motion was given to this Court on December 3, 2010 and was subject to argument before this Court on a Motion to Enlarge the Time for a Privilege Log which was heard on December 21, 2010 and resulted in an extension of time through January 31, 2011. Even though counsel could have obtained earlier hearing time, Edwards decided to wait until January 27, 2011, three days before the deadline for the submission of the privilege log to ask Judge Crow to stay the issuance of the subpoena in effect, which would then have the effect of circumventing the Orders of this Court and their deadlines. Judge Crow declined to enter such stay.

What is apparent is a calculated effort by Edwards, et al. to circumvent or vitiate this the orders of this Court requiring a privilege log.

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The actual prejudice and impact on Epstein by this wilful and continued non-compliance with this Court's many orders is measurable. In financial terms, Epstein has spent thousands of dollars in attorney's fees for rehashing and revisiting the same meritless arguments of Edwards relating to this subpoena. In addition, Epstein volunteered to pay the fees of a special master so that an in-camera hearing and privilege log could be reviewed without burdening the trustee and his counsel. Through December 31, 2010, Epstein has paid the Special Master \$12,731.90. Epstein will shortly provide this court with a fee and cost affidavit to liquidate these sums.

In non-economic terms, Epstein has been prejudiced because he has not been able to conduct critical discovery necessary for the prosecution of his claims. If the Court reviews the subpoena, it can be readily determined that all paragraphs request information that on their face do not require attorney-client or other privileged information with the exception of paragraph four. The documents within paragraph four may be privileged or may not depending on the subject matter of the communication which is why the privilege log is required. Records requested that are clearly not privileged were initially sought so that they could be reviewed to prepare for depositions. It does not make practical sense to take the depositions of witnesses, some of whom are out-of-state of Florida without the production of these records. Edwards has attempted to move the case in state court to trial or summary judgment before Epstein has had an adequate opportunity to conduct significant discovery. The state court proceedings have had to have been continued on two separate occasions due to the inability of Epstein to obtain this basic discovery.

It has already been well established that Rothstein ran an illegal Ponzi scheme through RRA. It is also been established that the Ponzi scheme included attracting investors to invest in

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the litigation against Jeffrey Epstein. It has further been established that actual case files of RRA against Jeffrey Epstein were shown to these investors. It is very difficult to believe that the attorney in charge of prosecuting the civil cases against Epstein was not aware that his case files were being shown to outside investors or was not aware that his cases against Epstein were the subject of a Ponzi scheme. The records requested in this subpoena are clearly relevant to establishing those claims.

If a party disobeys a court order requiring the production of documents or the preparation of a privilege log, the court may enter such orders that are just, including sanctions enumerated in Federal Rules of Civil Procedure 37(b)(2). Sanctions may be granted against a party under Rule 37 if there is not compliance with a court order, notwithstanding a lack of wilfulness or bad faith, although such factors are relevant to the sanctions imposed. *See: In Re: Seroquel Products Liability Litigation*, 244 FRD 650, 656 (M.D. Fla. 2007), cited in *H & I Corp. v. Advanced Medical Design, Inc.*, 251 FRD 667 (M.D. Fla. 2008). For the purposes of Rule 37, an incomplete response is to be treated as a failure to respond. Fed.R.Civ.P. 37(a)(3).

Rule 37 authorizes court to impose the following sanctions:

1. an order that facts in dispute be taken to be established in the favor of the parties seeking the motion, i.e. determination that privilege claims are waived;
2. an order precluding the party refusing to comply with the order from opposing or presenting evidence in opposition of the movant's claim, and
3. an order striking the offending party's pleading.

Fed.R.Civ.P. 37(b)(2). The Court may also order, in lieu of or in addition to these sanctions, that the party pay the reasonable expenses, including attorney's fees, caused by the

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failure to comply, unless the Court finds that the failure was substantially justified or that other circumstances make such an award unjust.

Rule 37 sanctions are imposed not only to prevent unfair prejudice to litigants but also to insure the integrity of the discovery process. *Aztec Steel Company v. Florida Steel Corp.*, 691 Fed. 2d 480, 482 (11th Cir. 1982).

Here the record demonstrates beyond dispute the following facts in support of a Motion for Sanctions:

1. Issuance of a subpoena for records directed towards the bankruptcy trustee;
2. Prior to the determination and assumption of jurisdiction by this court, no objection to the subpoena in state court or a motion for protective order in state court;
3. The filing of six (6) motions for protective order, essentially arguing the same grounds that the subpoena should not be enforced, attorney-client privilege, work product privilege, and over breadth and irrelevant matters within the subpoena;
4. Four (4) orders by this court still requiring the preparation of a privilege log and the production of non-privilege records, inspite of six (6) motions for protective orders;
5. An effort to circumvent this court's order by requesting the state court to stay the subpoena for which these court's orders had already been entered;
6. The passage of a deadline without substantial compliance of this court's order an appropriate privilege log;

The record demonstrates beyond dispute that Epstein incurred unnecessary expenses and delays in attempting to obtain compliance from Edwards, et al. of the orders by this court. Since August 13, 2010, when the court first required the privilege log, six (6) months have passed and still no proper privilege log has been prepared. Epstein is entitled to an issuance of an order to

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show cause why Edwards, et al. should not be held in contempt, the imposition of monetary sanctions, and any other relief deemed appropriate by this Court.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 15th day of February 2011, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day via U.S. Mail and e-mail on Jack Scarola, Esquire, Seth Lehrman, Esquire and Special Master, Robert B. Carney and upon all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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

JEFFREY EPSTEIN

Plaintiff,

v.

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

Defendants.

Complex Litigation, Fla. R. Civ. Pro. 1201

Case No. 50 2009CA040800XXXXMB AG

SUBPOENA DUCES TECUM FOR DEPOSITION – DOCUMENTS ONLY

THE STATE OF FLORIDA

TO: Herbert Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt Adler, PA
C/O James C. Cunningham, Jr., Esq.
Berger Singerman, P.A.
200 South Biscayne Blvd., Suite 1000
Miami, FL 33131

YOU ARE COMMANDED to appear at Prose Court Reporting, 101 NE 3rd Avenue,
Suite #1500, Ft. Lauderdale, FL 33301, on May 19, 2010, 4:00 p.m., bring with you the
following:

See attached Exhibit A

If you fail to appear, you may be in contempt of court.

You are subpoenaed by the attorney whose name appears on this subpoena and unless
excused from this subpoena by the attorney or the Court, you shall respond to this subpoena as
directed.

DATED this 16th day of April, 2010.



ROBERT D. CRITTON, JR.
(Attorneys for Defendant Jeffrey Epstein)
Burman, Critton, Luttier & Coleman
303 Banyan Blvd., Suite 400
West Palm Beach, FL 33401
561-842-2820

BY:



ROBERT D. CRITTON, JR., ESQ.
For the Court



EXHIBIT A

DEFINITIONS AND INSTRUCTIONS

A. "Document" means any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including the **originals** and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, letters, purchase orders, telegrams, teletype, telefax bulletins, e-mails, electronic data, meetings, reports, or other communications, interoffice and intra-office telephone calls, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, returns, trade information regarding fabric, carpets, samples etc..., computer printouts, prospectuses, financial statements, schedules, affidavits, contracts, cancelled checks, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphs or aural records or representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, video tape, recordings, motion pictures and electronic, mechanical or electric recordings or representations of any kind (including, without limitation, tapes, cassettes, discs and recordings), and including the file and file cover.

The term "Document" also means any and all computer records, data, files, directories, electronic mail, and information of whatever kind whether printed out or stored on or retrievable from floppy diskette, compact diskette, magnetic tape, optical or magnetic-optical disk, computer memory, hard drive, zip drive, jaz drive, orb drive,

microdisk, external memory stick, software, or any other fixed or removable storage media, including without limitation, all back-up copies, dormant or remnant files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether the data consists in an active file, deleted file, or file fragment.

B. "Communications" means any oral or written statement, dialogue, colloquialism, discussion, conversation or agreement.

C. "Plaintiff" means [REDACTED]. [REDACTED]. v. *Jeffrey Epstein, Palm Beach County Case #502008CA028051XXXXMB*), [REDACTED]. [REDACTED]. v. *Jeffrey Epstein, Palm Beach County Case #502008CA028058XXXXMB*), Jane Doe¹ (*Jane Doe v. Jeffrey Epstein, United States District Court Case #08-civ-80893-Marra/Johnson*), and any other person who is or was represented by Rothstein Rosenfeldt & Adler that has not yet filed an action against Jeffrey Epstein, and any employee, agent or attorney for any plaintiff and/or any other person acting for or on behalf of any plaintiff, or under her authority and control.

D. "RRA" means Rothstein Rosenfeldt & Adler, P.A.

E. "Money" means any tangible thing of value.

F. "Costs" include, but are not limited to, court costs, filing fees, Sheriff's service and any other necessary service of legal papers or notices or subpoenas, court reporters' charges, long distance telephone charges, postage, courier services or Federal Express or UPS, investigative costs, photocopies, faxes, Westlaw computerized research, travel expenses, and witness fees and expert witness fees and costs.

¹ If you are unable to identify each Plaintiff, please contact Robert D. Critton, Jr. at their names will be provided pursuant to a confidentiality agreement.

G. "Trustee" means Herbert Stettin as bankruptcy trustee for RRA.

DUCES TECUM²

1. For the time period from March 1, 2009 to present, any and all documents between, or on behalf of RRA, its employees or agents or clients, and any third party regarding a purported settlement of any litigation between Jeffrey Epstein and a RRA client or Plaintiff, or the financing of any litigation between Jeffrey Epstein and a RRA client or Plaintiff, (whether existing clients or fabricated clients), including but not limited to:

- a. Documents indicating that litigation with Jeffrey Epstein has been settled;
- b. Soliciting or receiving money in return for settlement funds allegedly paid or to be paid by Jeffrey Epstein;
- c. Soliciting money to help finance ongoing litigation against Jeffrey Epstein;
- d. Soliciting money to be given to, or used on behalf of, the Plaintiffs in litigation against Jeffrey Epstein;
- e. Communication between third party investors or potential investors and the Plaintiffs or their attorneys involved in litigation against Jeffrey Epstein;
- f. Payments made by RRA to or on behalf of any Plaintiff.

2. Any and all fee agreements that exist or have existed between the following:

- a. Any Plaintiff and Bradley J. Edwards or any entity with which he has been associated;
- b. Any Plaintiff and the law firm RRA.

3. All emails, data, correspondence, memos, or similar documents between Bradley J. Edwards, Scott W. Rothstein, William Berger and Russell Adler and/or any attorney or representative of RRA and any investor or third party (person or entity) regarding Jeffrey Epstein or which mentions Jeffrey Epstein (including Mike Fisten, Kenneth Jenne, Patrick Roberts or Rick (Rich) Fandrey).

4. All emails, data, correspondence, memos, or similar documents between Bradley J. Edwards, Scott W. Rothstein, and/or any attorney or representative of RRA regarding Jeffrey Epstein or which mentions Jeffrey Epstein (including Mike Fisten, Kenneth Jenne, Patrick Roberts or Rick (Rich) Fandrey).

² Due to the potential volume of documents involved, the parties and the Court should consider appointment of a special master and/or an In camera inspection to address any objections, claims of privilege and generally manage the production of documents.

5. All agreements or documents of any nature which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any of the following:

- a. Scott W. Rothstein;
- b. Bradley J. Edwards;
- c. RRA;
- e. any entity formed by RRA or Bradley J. Edwards or Scott W. Rothstein to create investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.

6. All fee sharing agreements between Bradley J. Edwards, RRA, or Scott W. Rothstein and/or any other attorney or investor relating to any aspect of any Plaintiff's case.

7. All documents made available to any investor or potential investor by Bradley J. Edwards, RRA, Scott W. Rothstein or any of Scott W. Rothstein's entities to solicit "investors" for any case involving Jeffrey Epstein.

8. All document reflecting the names and addresses of all individuals or entities who invested or purported to invest in any aspect of any case against Jeffrey Epstein.

9. All documents evidencing payment of any bill or cost in each Plaintiff's case against Jeffrey Epstein, and the source(s) for said payments of any Costs.

10. All documents wherein the Trustee of RRA has asserted a lien for attorney's fees or Costs arising out of work done and Costs incurred related to the Plaintiffs' cases during the time Plaintiffs' cases were represented by RRA.

11. All documents and tangible things retrieved from the trash at 358 El Brillo Way, Palm Beach, Florida which is alleged to be the home of Jeffrey Epstein.

12. All conversations recorded from any telephones which purported to be that of Jeffrey Epstein that are contained in any media (audio tapes, CDs, DVDs, zip drives, hard drives or any other electronic format and any written transcriptions)

13. All conversations recorded from any telephones which purported to be from Jeffrey Epstein's attorneys including Roy Black, Alan Dershowitz or Jack Goldberger, that are contained in any media (audio tapes, CDs, DVDs, zip drives, hard drives or any other electronic format and any written transcriptions)

14. All intercepted phone conversations authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA related to Jeffrey Epstein that are contained in any media (audio tapes, CDs,

DVDs, zip drives, hard drives or any other electronic format and any written transcriptions).

15. All intercepted or acquired electronic mail (e-mails) to and from Jeffrey Epstein authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA.

16. All intercepted or acquired electronic mail (e-mails) to and from the attorneys for Jeffrey Epstein including but not limited to: Roy Black, Alan Dershowitz or Jack Goldberger, authorized by RRA including but not limited to any one of its attorneys or investigators or anyone retained by or working for RRA.

17. All documents related to the amount of Costs that were incurred by RRA in its representation of Jane Doe, [REDACTED] and [REDACTED] and is claiming or has claimed

18. All documents which purport to evidence any transfer of funds or property from Jeffrey Epstein to RRA, Rothstein or any Rothstein-related entity for the settlement of any case (real or fabricated) against Jeffrey Epstein.

19. All documents which purport to mention any transfer of funders or property from Jeffrey Epstein to RRA, Rothstein or any Rothstein-related entity for the settlement of any case (real or fabricated) against Jeffrey Epstein.

20. All documents relating to any investment, joint-venture or business enterprise involving RRA, Rothstein or a Rothstein-related entity that reference any claim (real or fabricated) against Epstein.

21. All emails exchanged between any of the following individuals wherein Epstein, a Palm Beach billionaire or similar reference was mentioned:

- a. Scott Rothstein
- b. Russell Adler
- c. William Berger
- d. Michael Fisten
- e. Kenneth Jenne
- f. David Boden
- g. Deborah Villegas
- h. Andrew Barnett
- i. Patrick Roberbs
- j. Richard (Rick) Fandry
- k. Christina Kitterman
- l. Brad Edwards

22. All documents related to or referencing potential deponents in the Jane Doe, [REDACTED] or [REDACTED] cases.

23. All Q-Task "Projects" that refer to Jeffrey Epstein.
24. All Q-Task Projects that refer to [REDACTED], [REDACTED], or Jane Doe.
25. All documents that identify all individuals who were granted access (invited guests) or who had access to the Q-Task Projects referred to in request nos. 23 and 24.
26. All documents, communications and letters sent by you assessing liens against the recoveries in:
 - a. [REDACTED] v. Epstein, Case No. 502008CA028051XXXXMB
 - b. [REDACTED] v. Epstein, Case No. 502008CA028058XXXXMB
 - c. Jane Doe v. Epstein, Case No. 08-CV-80119-MARRA/JOHNSON
27. All documents related to the Costs that you, as bankruptcy Trustee, are claiming related to [REDACTED], [REDACTED], and Jane Doe's cases against Epstein. This includes any data or electronic printout of Costs which the Trustee of RRA is claiming.
28. Any employment agreements or letters describing compensation and benefits for Bradley Edwards during his employment with RRA.
29. All documents from the "Fortress" software program that refer or relate to Jeffrey Epstein.
30. All documents from the "Fortress" software program that refer or relate to [REDACTED], [REDACTED], or Jane Doe.
31. For the time period April 1, 2009 through November 5, 2009, all emails to and from any employee, partner, shareholder, attorney, agent or client of RRA that reference any of the following:
 - a. A.J. DiScala;
 - b. D3 Capital Club, LLC
 - c. Bill Clinton;
 - d. Alan Dershowitz;
 - e. David Copperfield;
 - f. Kevin Spacey;
 - g. Chris Tucker;
 - h. Prince Andrew
 - i. Jean-Luc Brunel;
 - j. Tommy Motolla;
 - k. Bill Richardson;
 - l. Donald Trump.

#291874/mep

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

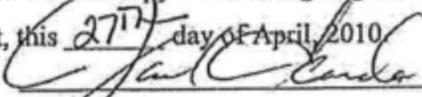
Defendant,

REQUEST FOR COPIES

COMES NOW the Defendant, BRADLEY J. EDWARDS, by and through his undersigned attorneys and pursuant to Florida Rule of Civil Procedure 1.351(e), hereby requests that Plaintiff, JEFFREY EPSTEIN, produce by mailing to Jack Scarola, Esquire, Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida 33409, immediately upon receipt, any and all records received pursuant to their Subpoena Duces Tecum returnable May 19, 2010 issued to:

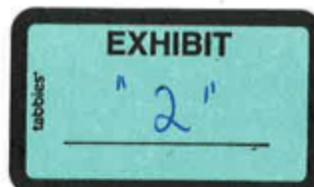
Herbert Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt Adler, P.A.
c/o James C. Cunningham, Jr., Esq.
Berger Singerman, P.A.
200 South Biscayne Boulevard, Suite 1000
Miami, FL 33131

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all counsel on the attached list, this 27th day of April, 2010.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409

Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Defendant, EDWARDS



ORDERED in the Southern District of Florida on 05/18/10



Raymond B. Ray

Raymond B. Ray, Judge
United States Bankruptcy Court

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

In re: CASE NO.: 09-34791-BKC-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

ORDER GRANTING TRUSTEE'S MOTION SEEKING A PROTECTIVE ORDER AND APPROVING PROPOSED DOCUMENT PRODUCTION PROTOCOL [D.E.#617]

THIS MATTER came before the Court on May 18, 2010 at 9:30 a.m on the Motion by Trustee Stettin For Expedited Relief Seeking A Protective Order And Approving Proposed Document Production Protocol (the "Motion for Protective Order") [D.E. #617]. The Court has reviewed the Motion for Protective Order, and the Response to Trustee's Motion for Expedited Relief Seeking Protective Order and Approving Proposed Document Production Protocol ("Repsonse") [D.E. #667] filed by Certain Creditors of RRA as detailed therein, and having heard the argument of counsel and otherwise being fully advised,

DOES HEREBY ORDER:



1. The Trustee's Motion for Protective Order is **Granted**.

2. To protect against the incidental disclosure of documents or Electronically Stored Information ("ESI") (hereinafter collectively "RRA Information") protected by any RRA attorney-client privilege or the work product doctrine, in accordance with Federal Rule of Civil Procedure 26(b)(5)(B) and Federal Rule of Evidence 502, the Court approves the following protocol to govern any demand, subpoena or request for production of RRA's electronically stored information:

A. Requesting Parties shall provide all search criteria, including names of targeted custodians, search terms, date ranges, to/from, subject line contents, or other criteria ("Search") to be applied against the RRA information, to the Trustee.

B. The Trustee will conduct the requested Search of RRA information after the mutual execution and filing with the Court of a Stipulated Protective Order. The Stipulated Protective Order shall include a clawback provision in accordance with Federal Rule of Evidence 502 and Federal Rule of Civil Procedure 26(b)(5)(B), which shall require the Requesting Party to destroy or return all copies of any documents, ESI or other RRA information that is made available to the Requesting Party as a result of the Search that is privileged data related to RRA's former representation of any former client. The Stipulated Protective Order shall allow the Trustee to move for immediate emergency injunctive relief to protect RRA's Client's privilege if necessary.

C. Before the Requesting Party publishes, files or distributes to any other party any information obtained from the document repository ("Resulting Data"), that Resulting Data intended to be used by the Requesting Party, unless otherwise available from other sources besides the Trustee, shall be disclosed to the Trustee who shall conduct a review for RRA's client's privilege before any RRA information may be published or otherwise used or distributed by the Receiving Party.

D. The terms of any filed Stipulated Protective Order shall apply to any subsequent requests to the Trustee for Search of RRA information by that Requesting Party.

3. The Trustee agrees to keep any keywords or search criteria provided to the Trustee by any Requesting Party confidential, only to be disclosed when required by Court Order.

4. By sharing any RRA Information with a third party document management system vendor, the Trustee does not waive any privilege or confidentiality over any documents otherwise protected by the work product doctrine or attorney-client privilege.

5. All Requesting Parties seeking production of responsive documents or ESI shall file with the Court their Stipulated Protective Orders before any access to any documents or ESI is provided by the Trustee to that Requesting Party.

6. Assuming compliance with this Order, any inadvertent disclosure of privileged material by the Trustee to any Requesting Party shall not be construed as a waiver of any privilege pursuant to Federal Rules of Evidence 502(d) and (e).

7. The Court retains jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.

#

Submitted by:

Charles H. Lichtman, Esq.
BERGER SINGERMAN, P.A.,
Attorneys for Chapter 11 Trustee, Herbert Stettin
350 E. Las Olas Blvd.
Suite 1000
Telephone: [REDACTED]
Facsimile: [REDACTED]
Direct Telephone: [REDACTED]

Copy furnished to:

Charles H. Lichtman, Esq.
(Attorney Lichtman is directed to serve this Order to all parties of interest and to file a Certificate of Service.)

2814103-1



ORDERED in the Southern District of Florida on August 13, 2010.

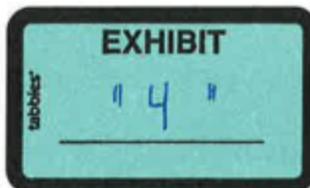
**Raymond B. Ray, Judge
United States Bankruptcy Court**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov**

IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

**ORDER RESPECTING PRODUCTION OF
DOCUMENTS REGARDING JEFFREY EPSTEIN**

THIS CAUSE came before the Court for hearing on August 4, 2010 upon (i) Motion to Compel Production of Documents from Trustee Pursuant to Document Production Protocol, as established by D.E. #672 (D.E. #807); (ii) Motion for Protective Order filed by Interested Party Farmer, Jaffe, Weissing, Edwards, Fistos and Lehrman, P.L. ("Farmer, Jaffe") (D.E. #818) and its related amendment (D.E. #819). The Court heard argument of all counsel present at the hearing, and being otherwise duly advised in the premises,



DOES HEREBY ORDER:

1. The Court appoints former Broward County Circuit Judge Robert Carney as Special Master who shall work with counsel for the Trustee to obtain documents responsive to the subpoena served upon the Trustee by Jeffrey Epstein to: (i) review all electronically stored information ("ESI") and other documents in the Trustee's possession, including Qtask data for purposes of determining the applicability of the attorney/client and work product privileges that may inure to the benefit of [REDACTED], Brad Edwards, and other current or former clients of Farmer, Jaffe; (ii) segregate any such privileged documents; and (iii) prepare a privilege log in accordance with standard practice and law.

2. Prior to engaging in this document review, the Special Master shall meet with counsel for Epstein, counsel for Farmer, Jaffe and counsel for the Trustee to hear their respective positions concerning these matters. Upon completion of the review by the Special Master, the Special Master shall prepare and file a privilege log with the Court. No documents or ESI shall be released to anyone until such time as the Special Master has notified the Court that he has concluded his review of the responsive documents and is in a position to report to the Court his findings and to obtain further instruction. Upon the filing of such notice by the Special Master, the Court shall set a continued hearing on the pending motions identified above. All legal fees and costs incurred by the Special Master shall be paid by Epstein, who has agreed to pay directly all such fees and costs.

###

Submitted by:

Charles H. Lichtman, Esq.
BERGER SINGERMANN, P.A.,
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, FL 33301
Telephone: [REDACTED]
Facsimile: [REDACTED]
[REDACTED]

Copy furnished to:

Charles H. Lichtman, Esq.
(Charles H. Lichtman is directed to serve this Order to all parties of interest and to file a Certificate of Service.)



ORDERED in the Southern District of Florida on October 15, 2010.

**Raymond B. Ray, Judge
United States Bankruptcy Court**

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov**

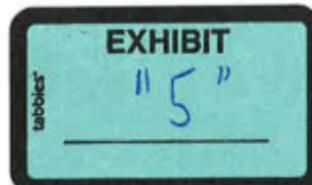
IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

**AMENDED ORDER RESPECTING PRODUCTION OF
DOCUMENTS REGARDING JEFFREY EPSTEIN**

THIS CAUSE came before the Court for hearing on October 13, 2010 upon the Motion to Clarify Order Appointing Special Master (D.E. #1013) which pertains to this Court's Order Respecting Production of Documents Regarding Jeffrey Epstein (D.E. #888) ("Order 888"). The Court heard argument of all counsel present at the hearing, and being otherwise duly advised in the premises,

DOES HEREBY ORDER:

1. Order 888 is amended solely as follows:



a. Within two business days following receipt of this order, Berger Singerman, as counsel for the Trustee, Herbert Stettin ("Trustee"), shall deliver to Gary Farmer at the Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. law firm ("Farmer Jaffe), a copy of the CD produced pursuant to Order 888 to Judge Robert Carney as Special Master and which contains all electronically stored information ("ESI") and other documents in the Trustee's possession, respecting the subject matter of the subpoena previously served upon the Trustee related to [REDACTED], Scott Rothstein, Brad Edwards and Jeffrey Epstein.

b. Farmer Jaffe shall review all documents contained on the CD and prepare a detailed privilege log within thirty (30) days of receipt of the CD. Farmer Jaffe shall serve the privilege log on all parties in interest to these proceedings and file same with the Court.

c. Contemporaneous with the service and filing of the privilege log, Farmer Jaffe shall provide to a reputable copy service an unredacted copy of the Trustee's CD of documents, and that copy service shall duplicate and bate stamp all documents on the CD, and return all materials to Farmer Jaffe, who shall forthwith notify Trustee's counsel and the Special Master of the bate stamp range of documents. Farmer Jaffe shall then extract from the hard copy duplicated documents solely those documents which it listed on the privilege log, and segregate those documents for submission to the Special Master and the Trustee's counsel. Farmer Jaffe shall furnish copies of the segregated documents to which it asserts a privilege both to the Special Master and the Trustee at Farmer Jaffe's cost.

d. To the extent that documents on the CD are duplicated and not subject to an assertion of privilege, they shall be forthwith provided to counsel for Epstein, counsel to the Razorback creditors, as well as to any other party who requests such documents, all at their own respective cost.

e. Following service and filing of the privilege log, the Special Master shall schedule a hearing to occur at the offices of Berger Singerman where all parties in interest will have the opportunity to provide written submissions respecting the privilege log and to make argument on all issues relevant to the applicability of privilege as to the documents listed on the Farmer Jaffe privilege log. That hearing shall be transcribed by a court reporter.

f. Following completion of the aforementioned hearing, the Special Master shall prepare a report making all appropriate findings and recommendations to the Court, which shall be served on all parties in interest and filed with the Court, along with the transcript of the Special Master's hearing.

g. Any party may file a written objection to the Special Master's report within ten days after service of same. If no party files an objection to the report, the Court shall approve the report and adopt same into a court order without further notice to the parties. If an objection to the report is filed by any party in interest, then this Court shall schedule and hold a hearing to resolve with finality the issues of privilege as consistent with the appropriate law and procedures set forth herein.

###

Submitted by:

Charles H. Lichtman, Esq.
BERGER SINGERMAN, P.A.,
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, FL 33301

Telephone: [REDACTED]

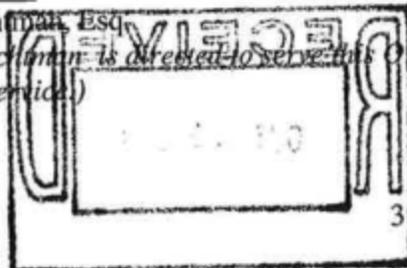
Facsimile: [REDACTED]

Copy furnished to:

Charles H. Lichtman, Esq.

(Charles H. Lichtman is directed to serve this Order to all parties of interest and to file a Certificate of Service.)

2996606-3



ORDERED in the Southern District of Florida on 11-30-10



Raymond B. Ray

Raymond B. Ray, Judge
United States Bankruptcy Court

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
Fort Lauderdale Division
www.flsb.uscourts.gov

IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

**AGREED ORDER CANCELLING HEARING ON MOTION
FOR RELIEF FROM AMENDED ORDER (DE 1068) AND TO COMPEL JEFFREY
EPSTEIN TO PAY FOR THE PRODUCTION OF ALL DOCUMENTS IN RESPONSE
TO HIS REQUESTS FILED BY INTERESTED PARTY
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.**

The Motion for Relief From Amended Order (D.E. #1068) and to Compel Jeffrey Epstein to Pay for the Production of All Documents in Response to his Requests filed by Interested Party Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L ("Farmer"), was adequately resolved by agreement of the parties as follows. The law firm of Fowler White Burnett, P.A., will print a hard copy of all of the documents contained on the discs with Bates numbers added, and will provide a set of copied, stamped documents to the Special Master and an identical set to Farmer,



CASE NO.: 09-34791-RBR

who will use same to create its privilege log. Farmer agrees to prepare that portion of the privilege log relating to emails on or before December 15, 2010, with the remaining portion due thirty days from the date of this order, subject to other court orders. Fowler White will not retain any copies of the documents contained on the discs provided to it, nor shall any images or copies of said documents be retained in the memory of Fowler White's copiers. Should it be determined that Fowler White or Epstein retained images or copies of the subject documents on its computer or otherwise, the Court retains jurisdiction to award sanctions in favor of Farmer, Brad Edwards or his client.

As such, the Motion for Relief is deemed moot, and, the hearing set on the Motion for Relief [D.E. 1146] set for November 30, 2010 is hereby cancelled. The court reserves jurisdiction to tax fees and costs related to the preparation of the privilege log upon filing of a proper motion and hearing thereon.

#

Submitted by:

Seth Lehrman, Esq.
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301
Tel.: [REDACTED]
Fax: [REDACTED]

Seth Lehrman, Esq. *who is directed to serve this Order to all parties of interest and to file a Certificate of Service.*



ORDERED in the Southern District of Florida on December 22, 2010.

Raymond B. Ray, Judge
United States Bankruptcy Court

UNITED STATES BANKRUPTCY COURT
BROWARD DIVISION
www.flsb.uscourts.gov



CASE NO. 09-34791-BKC-RBR
CHAPTER 11

IN RE

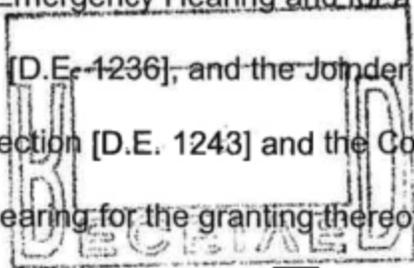
ROTHSTEIN ROSENFELDT ADLER, P.A.

Debtor.

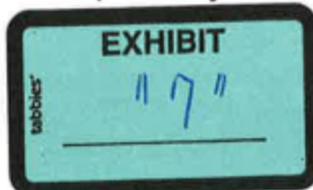
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ORDER GRANTING EXTENSION OF TIME

THIS MATTER came before the Court on December 21, 2010, on the Motion of for Emergency Hearing and for a Stay of Court Order Directing Preparation of Privilege Log [D.E. 1236], and the Joinder thereon [D.E. 1248] and Razorback's Limited Objection [D.E. 1243] and the Court has heard from the parties and good cause appearing for the granting thereof, it is:

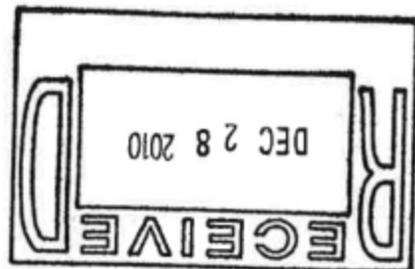


ORDERED that [redacted] and Bradley J. Edwards shall have until **January 31, 2011**, to complete the privilege log contemplated by this Court's Order.



###

Copies furnished to Seth Lehrman, Esq. who shall serve all interested parties and file a Certificate of Service thereon.



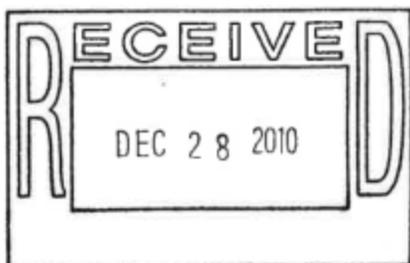
UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE: CASE NO.: 09-34791-RBR
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11
Debtor.

CERTIFICATE OF SERVICE
ORDER D.E. 1260

I HEREBY CERTIFY that a true and correct copy of **ORDER GRANTING EXTENSION OF TIME [D.E. 1260]**, was served electronically to the debtor, the attorney for the debtor, the trustee, all CM/ECF subscribers, and by email or U.S. Mail on those parties listed on the attached service list this 27th day of December, 2010.

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

CASE NO.: 502009CA040800 AG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

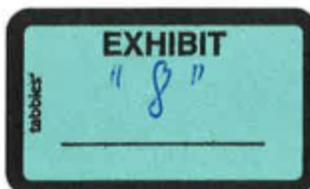
SCOTT ROTHSTEIN, etc., et al.,

Defendant(s).

ORDER ON DEFENDANT EDWARDS'
MOTION FOR SUMMARY JUDGMENT

THIS CAUSE came before the Court upon the Defendant, BRADLEY J. EDWARDS' Motion for Summary Judgment in regard to the claims brought by the Plaintiff, JEFFREY EPSTEIN. The Court, after carefully considering the arguments of the attorneys, after examining all pertinent pleadings, affidavits and other matters of record in regard to the Motion makes the following findings and legal rulings.

Upon Motion for Summary Judgment, the movant has the burden of conclusively demonstrating the non-existence of any genuine issue of material fact. *Holl v. Talcott*, 191 So.2d 40, 43 (Fla. 1966). The burden of demonstrating the existence of genuine issues does not shift to the opposing party until the movant has successfully met its burden. *Sasson v. Rockwell Mfg. Co.*, 715 So.2d 1066 (Fla. 3rd DCA 1998). When considering a Motion for Summary Judgment, it is settled that a trial court is not permitted to weigh material conflicting evidence or pass upon the credibility of the witnesses. *Id.* at 1067. Further, the Court must draw every possible inference in favor of the party against whom a Summary Judgment is sought. *Gonzalez v. B & B Cash Grocery Stores*, 692 So.2d 297 (Fla. 4th DCA 1997). If the record raises *even the slightest doubt* that

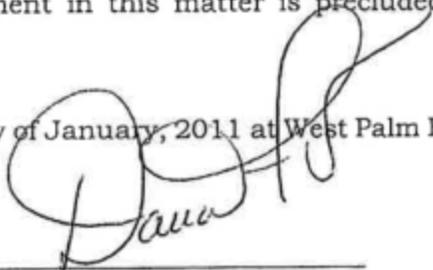


an issue might exist, Summary Judgment is precluded. *Fatherly v. California Federal Bank, FSBO*, 703 So.2d 1101 (Fla. 2nd DCA 1997). It hardly needs to be repeated that Summary Judgment cannot be granted if there is the slightest doubt about the presence of any issue of fact. See e.g., *Fleet Finance & Mortgage, Inc. v. Carey*, 707 So.2d 949 (Fla. 4th DCA 1998).

Moreover, it is also axiomatic that Summary Judgment is premature prior to the facts being crystallized and discovery being completed. Based upon the record evidence, this Court's prior Orders, as well as records of which this Court has taken judicial notice, Summary Judgment is premature at this point. Through no fault of his own, the Plaintiff has not been able to obtain records which clearly are calculated to lead to admissible evidence in this case. While the Defendant contends that those records do not and will never show any evidence to support the Plaintiff's claim, it would be manifestly unfair and error for this Court to rule upon the Motion prior to the Plaintiff having an opportunity to have access to those records. Moreover, there are numerous pending issues in regard to work product, privilege, both as to the Plaintiff and the Defendant, and to the records which are now in the custody of the trustee in bankruptcy.

Therefore, after careful consideration and examination of the record, and given the aforesaid authority, Summary Judgment in this matter is precluded and, therefore, the Motion is denied at this time.

DONE AND ORDERED this 11th day of January, 2011 at West Palm Beach,
Palm Beach County, Florida.

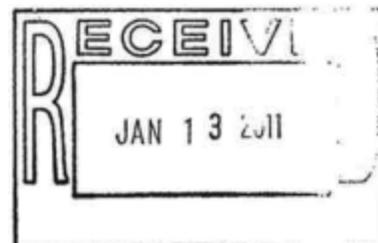


DAVID F. CROW
CIRCUIT COURT JUDGE

Epstein v. Rothstein, et al.
Case No. 502009CA040800 AG
Order
Page 3

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

CIVIL DIVISION

CASE NO.: 502009CA040809-AG

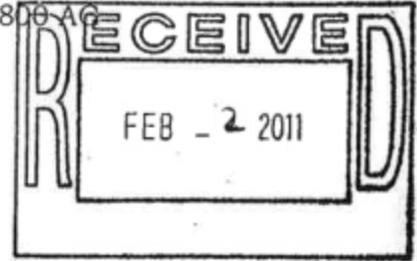
JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, etc., et al.,

Defendant(s).

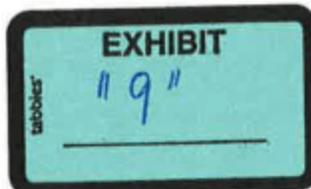


ORDER ON DEFENDANT EDWARDS'
MOTION TO STAY SUBPOENA, ETC.,

THIS CAUSE came before the Court upon the Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS' Motion for Stay of Subpoena, etc. The Court heard argument of counsel, has reviewed the Motion and has been provided with copies of various Orders from the bankruptcy proceeding for the Southern District of Florida. After thorough review of the above, otherwise being fully advised in the premises, it is hereby

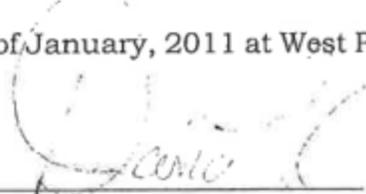
CONSIDERED, ORDERED AND ADJUDGED as follows:

The Motion seeks a stay of a subpoena/notice of production non-party directed to the bankruptcy trustee, Herb Stettin, in the bankruptcy court for the Southern District of Florida which seeks production of various records from the now defunct law firm of Rothstein, Rosenfeldt, Adler, P.A. which are in the possession of the trustee in bankruptcy. In response to these requests as well as a number of other requests from other claimants against the debtor law firm, the bankruptcy judge has taken jurisdiction to determine various privileges associated with these records. The Motion seeks an Order from this Court staying any subpoenas or notice of production from this Court and, therefore, removing jurisdiction from the bankruptcy court to make such determinations. This Court declines to do so. The bankruptcy court has set up a procedure for review and



determination of various privileges associated with these records. This Court will not interrupt that procedure. In doing so, however, this Court is not relinquishing any jurisdiction to ultimately determine whether or not records from the bankrupt law firm and/or any other records subpoenaed through this litigation are relevant, material, discoverable, privileged or not privileged for the *specific purposes of this litigation*. Moreover, this Court retains jurisdiction to determine whether any such privileges may have been eviscerated by reason of any alleged or claimed actions *in this litigation*.

DONE AND ORDERED this 31st day of January, 2011 at West Palm Beach,
Palm Beach County, Florida.



DAVID F. CROW
CIRCUIT COURT JUDGE

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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE: CASE NO.: 09-34791-RBR

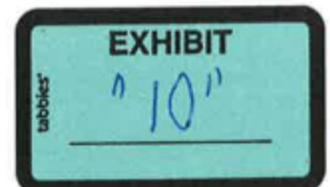
ROTHSTEIN ROSENFELDT ADLER, P.A., CHAPTER 11

Debtor.

PRIVILEGE LOG
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN

BATES STAMP	DESCRIPTION:	OBJECTION
Box 1	All documents herein contain discussion/communications within law firm/litigation team, clients, attorneys representing other Plaintiffs against Jeffrey Epstein or confidential sources regarding litigation strategy; communications with or relating to clients; and/or communications not responsive to the subject subpoena and irrelevant to any issues involved in this lawsuit.	Work product privilege; attorney-client privilege; joint work product privilege; irrelevant and not reasonably calculated to lead to discovery of admissible evidence.
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Privilege Log – Farmer, Jaffe, Weissing, et. al.



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Privilege Log – Farmer, Jaffe, Weissing, et. al.

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03245-03396

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BOX 3
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06538-06539

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01224-01251

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01749-01754
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06640-06642

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16904-16905

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16945
17033-17034
BOX 5
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04640-04641
04723
04726-04729
04750-04754
04763-04781
04783-04785
04797-04799
04806-04813
04819
04831-04832
04835-04836
04711
04855-04858
04861
04876-04877
04922-04923
04925-04926
04929-04934
04937-04938
04969-04972
05026-05027
05031
05037-05038
05042-05043
05046

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05074-05076
05100-05102
05105-05107
05110
05118-05119
05157-05158
05167-05168
05171-05172
05201-05202
05222-05223
05226
05229
05232-05233
05247
05251-05252
05258
05265-05266
05286-05287
05293-05294
05326-05327
05331
05334-05335
05347
05350
05353-05354
05367
05373-05374
05391-05393
05400-05401
05414-05415
05437-05439
05444-05445
05451
05469
05476-05494
05546
05579-05581
05613-05618
05633
05638-05639
05647
05656
05659
05668
05705

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05724
05727
05730-05731
05734
05737
05750
05770
05774-05776
05782-05783
05788-05790
05802
05806
05812
05814
05818-05819
05823
05832
05838
05847
05859
05863-05864
05886-05887
05902-05903
05906-05907
05912
05928-05930
05933-05934
05396
05938
05940-05941
05951
05957-05959
05960
05970-05971
05982-05983
05993-05994
05997
06042-06090
06402-06403
06409-06415
06428-06477
06453-06454
06465-06471
06476-06490
06630-06632

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06636-06639
06702-06708
06715-06719
06729-06735
06763-06766
06770-06781
06811-06812
06817-06822
06841-06860
06864-06875
06880-06890
06898-06900
06933-06934
06937-06938
06944-06952
06990-07009
07030
07090-07093
07110-07116
07145-07146
07210-07217
07220-07229
07280-07283
07633-07634
07710-07733
07740-07746
07748-07757
07913-07915
07917-07918
07931-07935
07965-07966
07977-07978
01716
01768
01771
01931
01998-01999
02021
01044
02048
02054
02062
02087
02140
02147-02149

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02174
02209-02210
02215-02217
02290
02355-02356
02362-02363
02374-02375
02420-02421
02435
02438
02462
02476-02477
02516
02554-02559
02584
02618
02627-02628
02672-02673
02727
02896
03009-03010
03028-03029
03038
03131-03132
03243-03244
03397-03400
03407-03414
03451-03452
03477-03479
03617-03627
03631-03633
03646-03656
03677-03687
03719-03736
03840-03847
03938-03939
03943-03945
02911-02912
02939
02968-02969
02977-02978
02994
08363
08338
08339

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08505
BOX 6
00008-00013
00153-00154
00995-01002
01015-01017
01029-01031
01033
01054-01055
01057-01070
01107-01108
01118-01120
01758-01760
03041-03043
01773-01779
01782-01783
01789-01792
03079
03071
03055
01926-01927
03106
01932-01939
03119-03121
01943
03129-03130
01953-01963
03133-03134
01966-01967
01970
01983-01989
03160-03180
02011-02016
03200-03204
03517-03519
02320-02321
02328-02330
02339
02342-02343
02352-02353
02393-02397
02451-02454
02566-02567
02591-02594
02597-02611

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08808-08815
12201-12280
12292-12389
15994-15995
12390-12422
15996-15997
12423-12568
12584-13021
13032-13067
13078-13079
13082-13087
13127-13311
13316-13365
13715-13859
13875-13888
13912-14025
14027-14075
19578-19585
19589-19594
19603-19648
23696-23843
24217-24279
23844-24216
24280-24400
18460-18479
20400-20402
18480-18486
20403-20407
18487-18494
20408-20415
18495-18502
20416-20426
18503-18521
20427-20445
18522-18550
20446-20476
18551-18558
20477-20523
18559-18586
20524-20566
18587-18588
20567-20574
18589-18590
20575-20632
18591-18624

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20633-20635
18625-18626
20636-20655
18627-18634
20656-20663
18635-18637
20664-20672
18638-18645
20673-20678
18646-18648
20679-20727
18649-18658
20728-20738
18659-18666
20739-20788
24401-24425
20789-20797
24426-24430
20798-20805
24431-24444
24945-24955
24445-24480
24956-24961
24481-24484
24962-25038
24485-24737
25039-25044
24738-24748