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DATE: March 15, 2011

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ATTENTION: Robert D. Critton, Jr., Esq.

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ATTENTION: Marc Nurik, Esq.

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FIRM/COMPANY: Farmer Jaffe Weissing et al.

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ATTENTION: Rodney Joseph James

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FIRM/COMPANY: Fowler White Burnett
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 Christopher Knight, Esq.
 FACSIMILE NUMBER: [REDACTED]
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 OUR FILE NUMBER: 15140-0001
 FROM: Charles H. Lichtman
 NUMBER OF PAGES SENT: 7 (including cover page)
 MESSAGE (if any):

3542169-1

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For better service and efficient business relations and contact
BERGER SINGERMAN
 attorneys at law

IF THE PAGES, PLEASE CALL AS SOON AS POSSIBLE.
 Boca Raton Fort Lauderdale Miami Tallahassee

**IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT, IN AND FOR
PALM BEACH COUNTY, FLORIDA.**

JEFFREY EPSTEIN,

Plaintiff,

v.

Case No. 502009CA040800XXXXMB AG

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendants.

NOTICE OF HEARING
(MOTION CALENDAR)

TO: See attached Service List

YOU ARE HEREBY NOTIFIED that the above cause will be heard before the Judge of the above-named Court to whom the case was assigned in Chambers at the Palm Beach County Courthouse, located at 205 North Dixie Highway, West Palm Beach, Florida as follows:

DATE: March 28, 2011

TIME: 8:45 a.m.

JUDGE: David Crow

ROOM: 9C

SPECIFIC MATTERS TO BE HEARD:

MOTION FOR PROTECTIVE ORDER FOR HERBERT STETTIN, TRUSTEE

I HEREBY CERTIFY that a bona fide effort has been made prior to the filing of this Notice of Hearing to resolve the matters set for hearing herein.

BERGER SINGERMAN
attorneys at law

Boca Raton Fort Lauderdale Miami Tallahassee

350 East Las Olas Boulevard Suite 1000 Fort Lauderdale, Florida 33301 Telephone 954-525-9900 Facsimile 954-523-2672

BERGER SINGERMAN
Attorneys for Herbert Stettin, Chapter 11 Trustee
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, Florida 33301



By: Charles H. Lichtman, Esq. 606421
Florida Bar No. 501050
CLichtman@bergersingerman.com

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished by facsimile and by U.S. Mail this 15th day of March, 2011 to the above-referenced addressee.

By: Charles H. Lichtman, Esq.

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Nicole Saunders, ADA Coordinator in the Administrative Office of the Court, Palm Beach County Courthouse, 205 North Dixie Highway, Room 5.2500, West Palm Beach, Florida 33401; telephone number (561) 355-4380 within two (2) working days of your receipt of this Notice of Hearing; if you are hearing or voice impaired, call 1-800-955-8771.

Si Usted es una persona incapacitada que necesita de un servicio especial para participar en este proceso, Usted tiene derecho a que le provean cierta ayuda sin costo alguno. Por favor pongase en contacto con el Coordinador de la Oficina Administrativa de la Corte ADA, situada en el 205 North Dixie Highway, Oficina 5.2500, West Palm Beach, Florida 33401, teléfono (561) 355-4380, dentro de los dos (2) próximos días hábiles después de recibir esta Notice of Hearing; si tiene incapacidad de oír ó hablar llame al 1-800-955-8771.

Si ou sé you moun ki Infirm, ki bézwen nimpôt akomodasyon pou ka patisipé nan pwosè sa-a, ou gen dwa, san'l pa kouté'w anyin, pou yo ba'w kèk sèvis. Tampri kontaké koòdinatè ADA ya nan Biro Administratif Tribinal nan cité Palm Beach la, ki nan 205 North Dixie Highway, Cham 5.2500, West Palm Beach, Florida 33401, niméro telefonn-nan sé (561) 355-4380, rélé dé (2) jou dé lè ou réséywa Notice of Hearing; si ou bèbè ou byen soud rélé 1-800-955-8771.

Si vous êtes infirme, et en besoin de n'importe accommodation pour pouvoir participer à ces procédures, vous pouvez gratuitement recevoir certains services. S'il vous plaît contactez le coordinateur du Bureau Administratif du Tribunal de Palm Beach, située à 205 North Dixie Highway, Chambre 5.2500, West Palm Beach, Florida 33401, numéro de téléphone (561) 355-4380 durant deux (2) jours suivant la réception de Notice of Hearing; si vous êtes muets ou sourds, appelez 1-800-955-87

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SERVICE LIST

Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards and L.M.
Case No. 50 2009CA040800XXXXMB AG

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

Complex Litigation, Fla. R. Civ. P. 1.201

Case No. 50 2009CA040800XXXXMB AG

JEFFREY EPSTEIN,

Plaintiff,

V.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendants.

MOTION FOR PROTECTIVE ORDER FOR HERBERT STETTIN, TRUSTEE

Herbert Stettin, Chapter 11 Trustee of Rothstein Rosenfeld Adler, P.A., ("RRA") hereby moves for a Protective Order as to a Subpoena issued upon him for records to be produced by March 16, 2011 and states:

1. First, jurisdiction over RRA rests in the United States Bankruptcy Court for the Southern District of Florida in the case of *In Re: Rothstein, Rosenfeld and Adler*, Case No. 09-34791-BKC-RBR. This Court has effectively recognized as much in a prior subpoena issued upon Mr. Stettin, RRA's Trustee. Moreover, the *Duces Tecum* portion of this Subpoena seeks the confidential employment records of eight RRA employees. The Trustee believes that the information requested is not only confidential, but has absolutely nothing to do with the claims pending in this lawsuit. Accordingly, the Trustee asks that this Court defer ruling on this matter to Bankruptcy Judge Raymond B. Ray, the presiding judge in the RRA bankruptcy, who has

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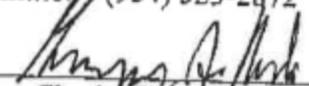
Boca Raton Fort Lauderdale Miami Tallahassee

360 East Las Olas Boulevard Suite 1000 Fort Lauderdale, Florida 33301 Telephone 954-525-9900 Facsimile 954-525-2872

Case No. 50 2009CA040800XXXXMB AG

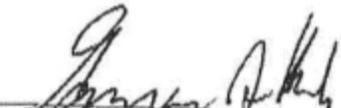
asserted jurisdiction over this issue, given that it affects RRA employees, and that a Protective Order be entered in this cause.

BERGER SINGERMAN
Attorneys for Trustee
350 East Las Olas Boulevard – Suite 1000
Fort Lauderdale, FL 33301
Telephone: (954) 525-9900
Direct: (954) 712-5138
Facsimile: (954) 523-2872

By:  (60642)
Charles H. Lichtman, Esq.
Florida Bar No. 501050
CLichtman@bergersingerman.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by U.S. Mail and facsimile on **Mr. Robert D. Critton, Jr.**, Burman Critton Luttier & Coleman, 303 Banyan Blvd., Suite 400 West Palm Beach FL; **Mr. Marc Nurik, Esq.**, Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Ft. Lauderdale, FL 33301; **Mr. Jack Scarola**, 2139 Palm Beach Lakes Blvd., West Palm Beach, FL; **Mr. Gary Farmer, Esq.**, Farmer Jaffe Weissing, et al., 425 N. Andrews Ave., Suite 2, Fort Lauderdale, FL 33301 and **Mr. Jack Goldberger, Esq.**, Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and to **Rodney Janis, Esq.**, Fowler, White Burnett, P.A., Phillips Point, West Tower, 777 S. Flagler Dr., Ste 901, West Palm Beach, Florida 33401; and to **Joseph L. Ackerman, Jr., Esq.**, **Lilly Sanchez, Esq.** and **Christopher Knight, Esq.**, Fowler White Burnett, P.A., 1395 Brickell Avenue, 14 Floor, Miami, FL 33131 on this 15th day of March, 2011.


Charles H. Lichtman

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