

SEARCY DENNEY SCAROLA BARNHART & SHIPLEY P.A.

*Attorneys
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VIA FAX AND U.S. MAIL

March 11, 2011

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, P.A.
777 S Flagler Drive, 901 Phillips Point West
West Palm Beach, FL 33401-6170

Re: Epstein v. Rothstein, et al
Our File No.: 291874

Dear Mr. Ackerman:

Enclosed please find Edwards' Motion for Protective Order, together with a Notice of Hearing for March 30, 2011, at 8:45a.m. You have noticed the deposition of Herbert Stettin for Wednesday, March 16, 2011; however, due to the suspension of Judge Crow's UMC calendar, we are unable to have this matter heard before the deposition date. We ask that you postpone this deposition until our motion can be heard on March 30th.

If there is a possibility of resolving any of the issues raised in the motion without the necessity of court intervention, please call me.

Since my schedule often makes it difficult to reach me by phone during regular business hours, I invite you, if necessary, to call me at home in the evening at [REDACTED].

Sincerely,



JACK SCAROLA
JS/mep
Enclosure
cc: Bradley J. Edwards, Esq.



ATTORNEYS AT LAW:

- ROBALYN BIA BAKER-BARNES
- *F. GREGORY BARNHART
- T. HANDEE BASS, III
- LAURIE J. BRIGGS
- BRIAN R. DENNEY
- *EARL L. DENNEY, JR.
- BRENDA S. FULMER
- JAMES W. GUSTAFSON, JR.
- JACK R. HILL
- DAVID K. KELLEY, JR.
- WILLIAM B. KING
- DARRYL L. LEWIS
- *WILLIAM A. NORTON
- PATRICK E. QUINLAN
- EDWARD V. RICCI
- *DAVID J. SALES
- *JOHN SCAROLA
- *CHRISTIAN D. SEARCY
- *JOHN A. SHIPLEY III
- CHRISTOPHER K. SPEED
- BRIAN P. SULLIVAN
- KAREN E. TERRY
- *D. CALVIN WARRINER III

SHAREHOLDERS
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- MARK R. PONCY
- KATHLEEN SIMON
- STEVE M. SMITH
- RONNIE S. STARK
- WALTER A. STEIN

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

NOTICE OF HEARING

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the following:

DATE: Tuesday, March 30, 2011

TIME: 8:45 a.m.

JUDGE: Honorable David F. Crow (Palm Beach County Courthouse)

PLACE: 205 N. Dixie Highway, West Palm Beach, FL 33401

ROOM #: 9-C

SPECIFIC MATTERS TO BE HEARD:

Motion for Protective Order (Deposition of Herbert Stettin)

Moving counsel certifies that he or she contacted opposing counsel and attempted to resolve the discovery dispute without hearing.

Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

***In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding, contact the Court Administrator's office not later than seven (7) days prior to the proceedings. If hearing impaired, contact (TDD) 1-██████████, or (V) 1-██████████ via Florida Relay.**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and U.S. Mail to all Counsel on the attached list, this 11th day of March, 2011.


JACK SCAROLA

Florida Bar No.: 169440

Searcy Denney Scarola Barnhart & Shiple, y

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: ██████████

Fax: ██████████

Attorney for Bradley J. Edwards

Case No.: 502009CA040800XXXXMBAG
Notice of Hearing

COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
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Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

#291874/mep

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN [REDACTED]
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

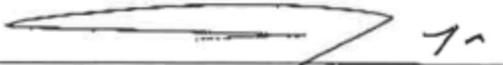
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

MOTION FOR PROTECTIVE ORDER

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for the entry of a protective order with respect to discovery sought pursuant to the attached Notice and in support would show that the document production described in the Notice is not reasonably calculated to lead to the discovery of admissible evidence and unreasonably invades the privacy rights of third-parties.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 11th day of March, 2011.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: [REDACTED]
Fax: [REDACTED]
Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Motion for Protective Order (Stettin)

COUNSEL LIST

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Phone: [REDACTED]
Fax: [REDACTED]

IN THE CIRCUIT COURT OF THE
15th JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY,
FLORIDA

JEFFREY EPSTEIN,

Plaintiff,

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

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

NOTICE OF TAKING DEPOSITION- DUCES TECUM*

PLEASE TAKE NOTICE that the undersigned attorney or an attorney of the firm will take the deposition of the following deponent and this deponent is to bring with him the following records on attached Duces Tecum on Schedule "A"

Name: Records Custodian,
Herbert Stettin, Trustee in Bankruptcy for RRA

Date and Time: Wednesday, March 16, 2011 at 11:00 a.m.

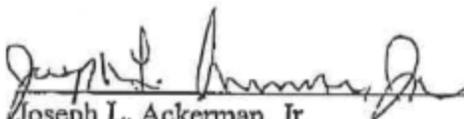
Place: Fowler White Burnett, P.A.
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131

Upon oral examination before ORANGE COURT REPORTING, Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for the use at trial, or for such other purposes as are permitted under the rules of the Court.

Case No. 50 2009CA040800XXXXMB AG
Epstein v Rothstein/Edwards
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Page- 2-

I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed and mailed this 4th day of March, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley, Attorneys for Bradley J. Edwards, 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409 and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, One E. Broward Blvd., Ste 700, Fort Lauderdale, FL 33301.

Respectfully submitted,



Joseph L. Ackerman, Jr.
Fla. Bar No. 235954
Christopher E. Knight
Fla. Bar No. 607363

FOWLER WHITE BURNETT P.A.
901 Phillips Point, West Tower
777 South Flagler Drive
West Palm Beach, FL 33401
Telephone: [REDACTED]
Facsimile: [REDACTED]

cc: Orange Court Reporting
[REDACTED]

cc: Charles Lichtman, Esquire (w/enclosures)

Case No. 50 2009CA040800XXXXMB AG
Epstein v Rothstein/Edwards
NTD-DT RC/Herb Stettin, Trustee
Page 3-

EPSTEIN v ROTHSTEIN, EDWARDS

SCHEDULE "A"

DUCES TECUM/Herb Stettin, Trustee RRA/RC Deposition:

Any and all employment records for the following employees at Rothstein, Rosenfeldt, Adler, P.A. ("RRA"), that shows her full name, residence address, telephone, social security number, date of birth, application for employment at RRA, I-9 forms, W-4 forms, application(s) for insurance benefits, payroll records and pay stubs, all references/emergency contacts which will include names, addresses and telephone numbers and drivers license information and a photocopy of any documents RRA took a photocopy of with picture ID on the following:

1. Cara L. Holmes
2. Jacqui Johnson
3. Mercedes Estrada
4. Elizabeth Kim
5. Christina Fitch
6. Carl Linder
7. Jonathan Birkman
8. Rob Buschel