

Joseph L. Ackerman, Jr.

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March 24, 2011

VIA EMAIL AND FIRST CLASS MAIL

Charles Lichtman, Esq.
Berger Singerman
350 East Las Olas Boulevard, Suite 1000
Ft. Lauderdale, FL 33301-4215

**Re: Jeffrey Epstein v. Scott Rothstein, individually, Bradley J. Edwards,
individually, and L.M., individually
PBC Circuit Case No. 502009CA040800XXXXMBAG
Our File No. 80743**

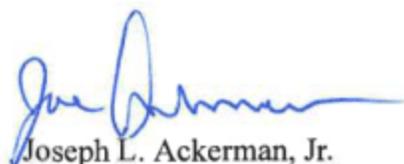
Dear Chuck:

Enclosed please find a proposed Agreed Order that I have sent to counsel in the *Epstein v. Rothstein, Edwards, et al.* matter which limits the scope of the subpoena that we previously served upon Mr. Stettin. A copy of that Subpoena Duces Tecum is enclosed for your easy reference.

This order is based on what we understood that you were willing to produce. Would you kindly confirm my understanding. If acceptable to you, I believe then that your Motion for Protective Order scheduled for March 28, 2011 before Judge Crow is not necessary and may be canceled.

Please advise. Thank you for your courtesies.

Sincerely yours,


Joseph L. Ackerman, Jr.

Enclosures

W:\80743\LETTR867-Letter Charles Lichtman, Esquire - proposed agreed order-JLA.docx

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

CIVIL DIVISION
CASE NO. 502009CA040800XXXXMBAG
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

AGREED ORDER

THIS MATTER came before this court on Motions for Protective Order filed on behalf of Bradley J. Edwards, Elizabeth Kim and Christina Finch. This Court having reviewed the motion, having been advised that there is no objection to the entry of this Order, it is hereby

ORDERED AND ADJUDGED that the motion is granted in part and denied in part as follows:

1. The motion is denied to the extent that the trustee may provide last known home address, home telephone number, and cellular telephone number for the following individual(s): Cara L. Holmes, Jacqui Johnson, Mercedes [REDACTED] Finch, Carl Linder, Jonathan Birkman, Rob Buschel.

2. The motion is granted to the extent it requests records containing any other information other than that set forth above in paragraph 1.

3. This Order is without prejudice to the Plaintiff to seek further relief should the information provided by the trustee is not sufficient to allow the Plaintiff to locate the above-named individual(s) for the purpose of serving a subpoena for deposition.

DONE AND ORDERED this ____ day of _____ in chambers at West Palm Beach, Palm Beach County, Florida.

Judge David F. Crow,
Circuit Judge

Copies Furnished to:

See attached Service List

SERVICE LIST

Epstein v Rothstein - 502009CA040800XXXXMBAG

Joseph L. Ackerman, Esq.
Fowler White Burnett, P.A.
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
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West Palm Beach, Florida 33409

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik
One E. Broward Blvd., Suite 700
Fort Lauderdale, Florida 33301

Bradley J. Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301

Charles H. Lichtman
Berger Singermann
350 Las Olas Blvd, 10th Floor
Ft. Lauderdale, FL 33301
Counsel for Trustee, Herbert Stettin

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 L.M., individually,

Defendants.

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

Case No. 50 2009CA040800XXXXMB AG

SUBPOENA FOR DEPOSITION DUCES TECUM

THE STATE OF FLORIDA:

TO: Records Custodian,
Herb Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt & Adler, P.A.
c/o James C. Cunningham, Jr.
Berger & Singerman, P.A.
200 South Biscayne Boulevard, Suite 1000
Miami, FL 33131

YOU ARE COMMANDED to appear before a person authorized by law to take depositions at the law offices of Fowler White Burnett, P.A., Espirto Santa Plaza, 1395 Brickell Avenue, 14th Floor, Miami, FL 33131 on **Wednesday, March 16, 2011, at 11:00 a.m.**, for the taking of your deposition in this action and to have with you at that time and place the following:

See Attached Schedule "A"

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

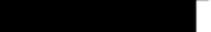
Epstein v Rothstein/Edwards
Case No. 502009CA040800XXXXMBAG
Subpoena DT/Herb Stettin, Trustee RRR/RC

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated on March 4, 2011.

For the Court

By: 
Joseph L. Ackerman, Jr., Esq.
FBN. 295354
Christopher E. Knight, Esq.
FBN. 607363

Joseph L. Ackerman, Jr., Esq.
Lilly Ann Sanchez, Esq.
Fowler White & Burnett, P.A.
Attorneys for Plaintiff, Jeffrey Epstein
Espirto Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, FL 33131
Telephone: 
Facsimile: 

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