

Joseph L. Ackerman, Jr.

April 19, 2011

fax

VIA EMAIL AND FIRST CLASS MAIL

Jack Scarola, Esquire  
Searcy Denney Scarola et al.  
2139 Palm Beach Lakes Boulevard  
P.O. Drawer 3626  
West Palm Beach, FL 33409

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

Dear Jack:

Enclosed please find a proposed Joint Statement of Pending Motions pursuant to the Case Management Order entered April 12, 2011.

I have attempted to state all of the motions that are pending. Please advise if there are any additional motions you wish added, and then I will add those to this statement and represent that you agree with the statement so it is a joint statement.

If you have any questions, please contact me.

Sincerely yours,



Joseph L. Ackerman, Jr.

Enclosure

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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,  
[REDACTED], individually,

Defendants.

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**JOINT STATEMENT OF PENDING MOTIONS**

Plaintiff, Jeffrey Epstein, ("Plaintiff" or "Epstein") and Defendant, Bradley J. Edwards, ("Edwards") file this Joint Statement pursuant to this Court's Case Management Order entered April 12, 2011, of all pending motions to be heard on May 19, 2011:

**PLAINTIFF, JEFFREY EPSTEIN'S MOTIONS**

1. Epstein's Motion to Compel/Motion to Determine if Privileged Claims are Waived (D.E. 232);
2. Epstein's Motion for Protective Order Regarding the Video Deposition of Jeffrey Epstein (D.E. 287);
3. Epstein's Motion for Protective Order Relating to the Deposition of Alfred Seckel, served April 19, 2011;
4. Epstein's Amended and Supplemental Motion to Overrule Objections and Compel Edwards to Answer Questions and Appear for Further Deposition (D.E. 230);

5. Epstein's Motion for Protective Order Relating to Extra Judicial Statements (D.E. 271);

**DEFENDANT, BRADLEY J. EDWARDS' MOTIONS**

6. Edwards' Motion to Dismiss Plaintiff's Amended Complaint, served April 17, 2011;

7. Edwards' Motion for Protective Order and Objections to Canceled Notice of Taking Deposition and Appointment of Special Master (D.E. 249);

8. Edwards' Motion to Assert Punitive Damage Claims, argued with ruling pending;

9. Edwards' Motion for Reconsideration of Order Sustaining Plaintiff's Objections to Discovery dated December 22, 2010, (D.E. 168), argued with ruling pending.

**NON-PARTY MOTIONS**

10. Spencer Kuvin's Motion for Protective Order and Objection to Subpoena for Joint Privilege Documents (D.E. 267);

11. Non-Party Podhurst & Orseck, P.A.'s Motion for Protective Order and Stay Order, served March 31, 2011.

**JOINDER**

The undersigned consulted with Jack Scarola, counsel for Edwards, who authorized the undersigned to represent he agrees and joins in this Statement.

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was sent via facsimile and mailed this \_\_\_\_ day of April, 2011 to Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard,

Suite 700, Fort Lauderdale, FL 33301; and Jack Scarola, Esquire, Searcy Denney Scarola et al.,  
2139 Palm Beach Lakes Boulevard, P.O. Drawer 3626, West Palm Beach, FL 33409.

Respectfully submitted,

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Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954  
Email: [REDACTED]

FOWLER WHITE BURNETT, P.A.  
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