

#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
L.M., individually,

Defendant.

**PLAINTIFF'S MOTION TO COMPEL AND IMPOSE
SANCTIONS FOR FAILURE TO APPEAR**

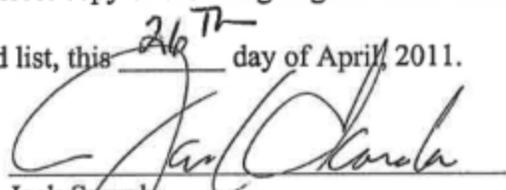
Defendant/Counter-Plaintiff, Bradley J. Edwards, by and through his undersigned counsel, moves this Honorable Court for an order imposing sanctions against the Plaintiff for his failure to appear and compelling the attendance of Plaintiff, Jeffrey Epstein, at deposition, and as grounds therefore would show:

1. The deposition of Jeffrey Epstein was duly noticed at a time convenient for Plaintiff as well as Defendants.
2. Jeffrey Epstein did not appear for the deposition and Edwards' counsel was informed by counsel for Plaintiff that Jeffrey Epstein was notified of the deposition and simply chose not to appear.
3. Defendant/Counter-Plaintiff has been forced to move to compel the appearance of Plaintiff and to travel to Palm Beach County for a hearing of this Motion, and the deposition, and has incurred additional unnecessary time and expenses.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel and Impose Sanctions for Failure
to Appear

WHEREFORE, Plaintiff moves for an order imposing sanctions against the Plaintiff, Jeffrey Epstein, compelling attendance of Jeffrey Epstein for deposition and for an order taxing attorney's fees necessitated by Plaintiff's cavalier attitude toward the litigation.

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 26th day of April, 2011.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley



Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel and Impose Sanctions for Failure
to Appear

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Martin Weinberg, P.C.



Attorneys for Jeffrey Epstein

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FIFTEENTH JUDICIAL CIRCUIT IN
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JEFFREY EPSTEIN,

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No. 502009CA040800XXXXMBAG

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

Defendants.

CERTIFICATE OF NON-APPEARANCE

DEPOSITION OF: JEFFREY EPSTEIN
DATE: APRIL 13, 2011
TIME: 9:30 a.m.
PLACE: SEARCY, DENNEY, SCAROLA,
BARNHART & SHIPLEY, P.A.



STATE OF FLORIDA)
) ss.
COUNTY OF BROWARD)

I, CHRISTINE PHIPPS, RPR, FPR, CLR, do hereby certify that I was present for the purpose of reporting this deposition and that the deponent did not appear.

Under penalties of perjury, I declare that I have read the foregoing certificate and that the facts stated in it are true.

Christine Phipps



Phipps Reporting

A appear 1:41 APRIL 1:26 █ 1:27	Florida 1:6,31 1:34,51 foregoing 1:43 FPR 1:38,48	SEARCY 1:28 SHIPLEY 1:29 ss 1:35 STATE 1:34 stated 1:44		
B BARNHART 1:29 Beach 1:6,30,31 1:51 Boulevard 1:30 BRADLEY 1:15 BROWARD 1:36	I individually 1:14,16,17	T TIME 1:27 true 1:44		
C certificate 1:23 1:43 certify 1:39 Christine 1:38 1:48 CIRCUIT 1:4,5 CLR 1:38,48 Club 1:50 COUNTY 1:6 1:36 COURT 1:4	J J 1:15 JEFFREY 1:9 1:25 JUDICIAL 1:5	V vs 1:12	W West 1:31,51	
D DATE 1:26 declare 1:42 Defendants 1:19 DENNEY 1:28 deponent 1:41 deposition 1:25 1:40 Drive 1:50	L Lakes 1:30 Legend 1:50 L.M 1:16	1 13 1:26	2 2011 1:26 2139 1:30	
E EDWARDS 1:15 EPSTEIN 1:9 1:25	N NON-APPEA... 1:23	3 33412 1:51	5 502009CA040... 1:12	
F facts 1:44 FIFTEENTH 1:5	P Palm 1:6,30,31 1:51 penalties 1:42 perjury 1:42 Phipps 1:38,48 1:49 PLACE 1:28 Plaintiff 1:11 present 1:39 purpose 1:39 P.A 1:29	8 8517 1:50	9 9:30 1:27	
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	S SCAROLA 1:28 SCOTT 1:14			