

#291874/mep

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).

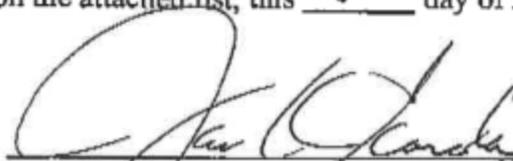
**BRADLEY EDWARDS' RESPONSE TO PLAINTIFF'S
REQUEST TO PRODUCE OF APRIL 7, 2011**

Defendant/Counter-plaintiff, Bradley J. Edwards, by and through his undersigned attorneys and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Plaintiff, JEFFREY EPSTEIN's, Request to Produce dated April 7, 2011 as follows:

1. Objection. The identification of specific public statements made by Epstein is protected by the attorney work product privilege.
2. Objection. The identification of documents "reflecting or tending to support" legal positions taken on behalf of the Defendant is protected by the attorney work product privilege.
3. Objection. The identification of documents "reflecting or tending to support" legal positions taken on behalf of the Defendant is protected by the attorney work product privilege.

Edwards adv. Epstein, et al.
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and/or U.S. Mail to all Counsel on the attached list, this 5th day of May, 2011.



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Edwards adv. Epstein, et al.
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