

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,

Defendants.

PLAINTIFF'S SUPPLEMENTAL STATEMENT OF PENDING MOTIONS

Plaintiff, Jeffrey Epstein, ("Plaintiff" or "Epstein"), by and through his undersigned counsel files this Plaintiff's Supplemental Statement of Pending Motions pursuant to this Court's Case Management Order entered April 12, 2011, to be heard on May 19, 2011 (D.E. 289). The Joint Statement of Pending Motions (D.E. 301) was previously filed with the Court.

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 to Quash Subpoena and for Protective Order to Prevent Deposition of Alfred Seckel, served May 2, 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. Plaintiff/Counter-Defendant, Jeffrey Epstein's Amended Motion for a Protective Order to Preclude Opposing Counsel and Defendant/Counter-Plaintiff From Making Extrajudicial Statements and Commentary to Media and Press, With Incorporated Legal Authorities. (Edwards' Response to this Motion is at (D.E. 301);

6. Plaintiff's Request for Production to Edwards dated April 7, 2011 and Edwards' Response/Objections to Plaintiff's Request for Production).

DEFENDANT, BRADLEY J. EDWARDS' MOTIONS

7. Edwards' Motion to Dismiss Plaintiff's Amended Complaint, served April 17, 2011 (D.E. 295);

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

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

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

11. Edwards' Motion to Compel and Impose Sanctions for Failure to Appear for Deposition (D.E. 300)

12. Edwards' Motion to Permit Additional Interrogatories (D. E. 280).

NON-PARTY MOTIONS

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

14. Non-Party Podhurst & Orseck, P.A.'s Motion for Protective Order and Stay Order, served March 31, 2011 (D.E. 278).

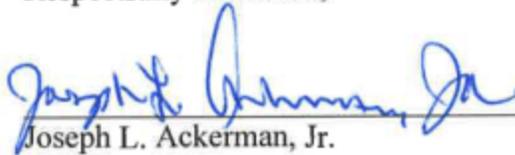
I **HEREBY CERTIFY** that a true and correct copy of the foregoing was emailed and mailed this 6th day of May, 2011 to:

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Respectfully submitted,



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