

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

JEFFREY EPSTEIN,

Complex Litigation, Fla.R.Civ.Pro. 1.201

Case No. 502009CA040800XXXXMBAG

Plaintiff,

v.

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

Defendants.

**PLAINTIFF, JEFFREY EPSTEIN'S NOTICE OF SERVING ANSWERS TO
DEFENDANT, BRADLEY J. EDWARDS' EXPERT INTERROGATORIES AND
REQUEST TO PRODUCE EXPERT REPORTS DATED NOVEMBER 22, 2010**

Plaintiff, Jeffrey Epstein, by and through his undersigned counsel, and pursuant to Rule 1.340(e) Florida Rules of Civil Procedure, files this his Notice of Serving Answers to Defendant, Bradley J. Edwards' Expert Interrogatories numbered 1 through 13 and Request to Produce Expert Reports numbered 14-16 bearing certificate of service date of November 22, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been duly furnished via Email, Facsimile, U.S. Mail, Hand Delivery, Federal Express this 20 day of December, 2010 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
[REDACTED]
West Palm Beach, FL 33409

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
[REDACTED]
West Palm Beach, FL 33401-5012

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik
[REDACTED]
Ft. Lauderdale, FL 33301

By: Joseph L. Ackerman, Jr.
Joseph L. Ackerman, Jr.
Fla. Bar No. 235954
FOWLER WHITE BURNETT P.A.

[REDACTED]
West Palm Beach, Florida 33401
Telephone: [REDACTED]
[REDACTED]

*Attorneys for Jeffrey Epstein, Plaintiff/
Counter-defendant*

EPSTEIN'S ANSWERS TO EDWARDS EXPERT INTERROGATORIES

1. State the name, address and profession of each person whom you expect to call as an Expert witness at trial or for any other purposes in this cause.

Answer: We have not retained any experts at this time.

2. With regard to each listed above, state his/her background, education and experience which qualify him/her to testify as an expert in his/her area of expertise; and/or in lieu thereof, please provide a copy of each expert's most recent curriculum vitae.

Answer: Not applicable.

3. Give the name or title of each paper which each expert has authored in the field of his/her expertise.

Answer: Not applicable.

4. State the name, volume and page number of the publication in which each article or paper listed above can be found.

Answer: Not applicable.

5. State the substance of the facts to which each expert listed is expected to testify.

Answer: Not applicable.

6. Give a complete list of all documents, depositions, exhibits, plans, drawings, ordinances or statutes which each expert has used in basing his/her opinion.

Answer: Not applicable.

7. State the opinion to which the experts aforementioned are expected to testify.

Answer: Not applicable.

8. Give a summary of the grounds of each opinion stated.

Answer: Not applicable.

9. Has the expert listed above practiced or worked in his/her field during the past five years?

Answer: Not applicable.

10. If so, please state:
- Whether the expert was self-employed, employed by someone else or associated as a partner.
 - Each address where the expert practiced or was employed.
 - The dates the expert was with each employer.
 - The type of duty the expert performed with each employer.

Answer: Not applicable.

11. If the expert was not practiced or worked in his/her field during the last five years, what was his/her employment during this time?

Answer: Not applicable.

12. Did the expert submit a report setting forth his/her opinions or conclusions reached from his/her examination or any tests he/she conducted?
- If so, state the date the report was submitted.
 - The name or other means of identification of the person to whom this report was submitted.
 - The name and address of the person who has present custody of the report.

Answer: Not applicable

13. Did the expert submit any other reports based upon tests, examinations or analysis of documents that he/she conducted in which he/she did not render an opinion?
- If so, state description of each report that was made.
 - the date that each report was made.
 - The name or other means of identification of the person to whom each report was submitted.
 - The name and address of the person who has present custody of said report.

Answer: Not applicable.

EPSTEIN'S RESPONSE TO REQUEST TO PRODUCE EXPERT REPORTS

14. Attach a copy of any reports made by each expert on the basis of his/her tests, examinations or analyses to your answers to these Interrogatories.

Answer: Not applicable.

15. Is the expert to be compensated for his/her work and efforts in connection with this action?

Epstein's Ans to Edws' Exp Interrog and RTP Exp Reports 11-22-2010

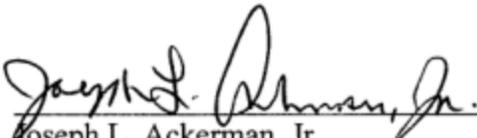
- a. If so. How much is the expert to be paid?
- b. If the expert has been paid, then give the basis for payment, such as hourly rate, weekly rate, etc.

Answer: Not applicable.

16. Has the expert served as an expert witness in any other litigated case in the past three years?

- a. The style of the case, the Court in which it was filed and the names and addresses of the attorneys involved.
- b. Whether the expert testified for the Plaintiff or Defendant.
- c. the area or field in which the expert held himself/herself out to be an expert.

Answer: Not applicable.



 Joseph L. Ackerman, Jr.
 As Attorney-In-Fact

State of Florida)
County of Palm Beach)

The foregoing instrument was acknowledged before me this 21st day of December, 2010 by Joseph L. Ackerman, Jr., who is personally to me or ~~who has produced~~ N/A as identification and who ~~did~~ did/not take an oath.

(SEAL)



 (Notary Signature)

LILIA DAVIDSON

 (Print Notary Name)

Notary Public, State of FLORIDA

(Serial Number, if any)



LILIA DAVIDSON
 MY COMMISSION # DD 958681
 EXPIRES: March 10, 2014
 Bonded Thru Budget Notary Services

#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).

_____ /

**NOTICE OF PROPOUNDING EXPERT INTERROGATORIES
TO PLAINTIFF/COUNTERDEFENDANT, JEFFREY EPSTEIN**

Defendant/Counterplaintiff, Bradley J. Edwards, hereby gives notice that pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, Expert Interrogatories numbered 1 through 16 have been directed to Plaintiff/Counterdefendant, Jeffrey Epstein, this 22nd day of November, 2010.

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 on this 22nd day of November, 2010.



Jack Scarola
Florida Bar No.: 169440
Searey Denney Scarola Barnhart &
213

Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Expert Interrogatories To Jeffrey Epstein

COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.

[REDACTED]

West Palm Beach, FL 33401

[REDACTED]

Attorneys for Jeffrey Epstein

Gary M. Farmer, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL

[REDACTED]

Christopher E. Knight, Esq.
Joseph L. Ackerman, Esq.
Fowler White Burnett, P.A.

[REDACTED]

Attorneys for Jeffrey Epstein

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik

[REDACTED]

Attorneys for Scott Rothstein

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Expert Interrogatories To Jeffrey Epstein

- c. The dates the expert was with each employer.

 - d. The type of duty the expert performed with each employer.
-
- 11. If the expert has not practiced or worked in his/her field during the last five years, what was his/her employment during this time?

 - 12. Did the expert submit a report setting forth his/her opinions or conclusions reached from his/her examination or any tests he/she conducted?
 - a. If so, state the date the report was submitted.

 - b. The name or other means of identification of the person to whom this report was submitted.

 - c. The name and address of the person who has present custody of the report.

Edwards adv. Epstein
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13. Did the expert submit any other reports based upon tests, examinations or analyses of documents that he/she conducted in which he/she did not render an opinion?

a. If so, state description of each report that was made.

b. The date that each report was made.

c. The name or other means of identification of the person to whom each report was submitted.

d. The name and address of the person who has present custody of said report.

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16. Has the expert served as an expert witness in any other litigated case in the past three years?

If so, state as to each case:

a. The style of the case, the Court in which it was filed and the names and addresses of the attorneys involved.

b. Whether the expert testified for the Plaintiff or Defendant.

c. The area or field in which the expert held himself/herself out to be an expert.

STATE OF _____)

COUNTY OF _____)

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Expert Interrogatories To Jeffrey Epstein

The foregoing instrument was acknowledged before me this _____ day of _____, 20____, by _____, who is personally known to me or who has produced _____ as identification and who did did/ not take an oath.

(SEAL)

(Notary signature)

(Notary name - print)
NOTARY PUBLIC, State of Florida

(Serial number, if any)