

Joseph L. Ackerman, Jr.
[REDACTED]
[REDACTED]

August 11, 2011

VIA EMAIL AND FIRST CLASS MAIL

Jack Scarola, Esquire
Searcy Denney Scarola et al.

[REDACTED]
West Palm Beach, FL 33409

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

Dear Mr. Scarola:

I am requesting an additional ten (10) days or through and including August 22, 2011 to serve the Second Amended Complaint.

Enclosed is a copy of the Motion for Enlargement of Time to Serve Second Amended Complaint and Notice of Hearing for your review and consideration. I have set this motion for hearing on Judge's Crow's Uniform Motion Calendar for Thursday, August 18, 2011, at 8:45 [REDACTED]. This is the soonest appointment we could obtain due to Judge Crow's UMC suspensions from August 15, 2011 – August 17, 2011.

In an effort to resolve this matter without the need of a hearing, please advise me at your earliest opportunity if you have any objection to this motion and if you would agree to the entry of the enclosed Agreed Order.

Sincerely yours,


Joseph L. Ackerman, Jr.

Enclosures

cc: Jack Alan Goldberger, Esq. (via email & regular mail)
Marc S. Nurik, Esq. (via email and regular mail)
Martin Weinberg, Esq. (via email and regular mail)

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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/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiffs.

NOTICE OF HEARING- (UMC)

PLEASE TAKE NOTICE that the undersigned has set down for hearing before the Honorable Honorable David Crow, one of the Judges of the above-styled Court, in Courtroom 9C at Palm Beach County Courthouse, 205 North Dixie Highway, West Palm Beach, Florida on Thursday, August 18, 2011 at 8:45 [REDACTED], the following:

**Plaintiff/Counter-Defendant Jeffrey Epstein's Motion for
Enlargement of Time to Serve His Second Amended Complaint**

I hereby certify that I have made a good faith attempt to resolve this matter prior to my noticing this motion for hearing.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

In accordance with the Americans With Disabilities Act of 1990, persons needing a special accommodation to participate in this proceeding should contact Barry Blacey, ADA Coordinator for the Courts of Palm Beach County, 205 N. Dixie Highway, West Palm Beach, Florida 33401, Telephone Number [REDACTED] no later than seven days prior to the proceeding.

CERTIFICATE OF SERVICE

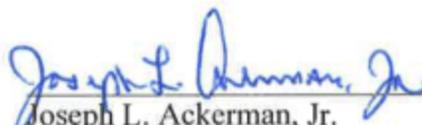
I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been duly furnished via Email, Facsimile, U.S. Mail, Hand Delivery, Federal Express this 11th day of August, 2011 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, [REDACTED]
[REDACTED]

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, [REDACTED]
[REDACTED]

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik
[REDACTED]

Martin Weinberg, Esquire
Martin G. Weinberg, [REDACTED]
[REDACTED]



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

FOWLER WHITE BURNETT, [REDACTED]
[REDACTED]

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/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually and
BRADLEY J. EDWARDS, individually,

Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION FOR
ENLARGEMENT OF TIME TO SERVE SECOND AMENDED COMPLAINT**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, files this Motion for Enlargement of Time to Serve His Second Amended Complaint. The grounds for this motion are as follows:

1. The case was initially filed on December 7, 2009.
2. Fowler White Burnett entered the case on an Order Granting Substitution of Counsel dated June 10, 2010.
3. At the hearing in this matter on April 1, 2011, the Court ordered Epstein to amend his complaint, which was done.
4. On July 13, 2011, the Court dismissed the Amended Complaint and gave the Plaintiff thirty (30) days to amend; i.e., up to any including August 12, 2011.
5. The parties have conducted extensive settlement discussions in an effort to resolve this case and another related case without success.

6. Epstein has engaged in reviewing other records which he believes are necessary for the Second Amended Complaint. A review of these records are extensive and time consuming. Since April 1, 2011, essentially all discovery has been stayed by the Court.

7. Due to the settlement efforts and the time necessary to conclude review of these additional records, together with unexpected emergencies in other matters that have arisen, an additional ten (10) days are necessary for counsel to complete and serve the Second Amended Complaint.

8. There is no prejudice to the Defendants on granting this enlargement because the case is not yet set for trial.

9. Given the complexity of the case, the number of documents that had to be reviewed, and the desire of the Plaintiff to streamline the issues relating to privilege that may arise subsequent to the filing of this Second Amended Complaint, additional time is required.

10. The undersigned counsel certifies that this motion is made in good faith and not for the purpose of delay.

11. The undersigned further certifies that he will endeavor to continue to make an effort to resolve this matter without the need of a hearing.

WHEREFORE, Plaintiff/Counter-Defendant Jeffrey Epstein requests this Court to grant his Motion for Enlargement of Time to Serve Second Amended Complaint by permitting Plaintiff to through and including August 22, 2011 to serve his Second Amended Complaint.

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 11th day of August, 2011 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, [REDACTED]

[REDACTED]

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, [REDACTED]

[REDACTED]

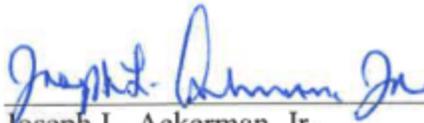
Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik

[REDACTED]

Martin Weinberg, Esquire
Martin G. Weinberg, [REDACTED]

[REDACTED]

Respectfully submitted,



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

FOWLER WHITE BURNETT, [REDACTED]

[REDACTED]

*Attorneys for Plaintiff/Counter-Defendant
Jeffrey Epstein*

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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/Counter-Defendant,

v.

SCOTT ROTHSTEIN, individually and
BRADLEY J. EDWARDS, individually,
and [REDACTED], individually,

Defendants/Counter-Plaintiffs.

**AGREED ORDER ON PLAINTIFF/COUNTER-DEFENDANT'S MOTION FOR
ENLARGEMENT OF TIME TO SERVE SECOND AMENDED COMPLAINT**

THIS MATTER having come before the Court on Plaintiff/Counter-Defendant, Jeffrey Epstein's Motion for Enlargement of Time to Serve His Second Amended Complaint, pursuant to this Court's Order dated July 25, 2011. The parties having agreed to the entry of this Agreed Order and the Court having otherwise been fully advised, it is hereby

ORDERED AND ADJUDGED that Plaintiff/Counter-Defendant, Jeffrey Epstein's Motion for Enlargement of Time to Serve his Second Amended Complaint is GRANTED and Plaintiff/Counter-Defendant, Jeffrey Epstein shall have through and including Monday, August 22, 2011 to serve the Second Amended Complaint.

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County, Florida this ____ day of August, 2011.

David F. Crow,
Circuit Judge

Copies Provided to:
All Counsel on Attached Service List

SERVICE LIST

Epstein v Rothstein - 502009CA040800XXXXMBAG

Joseph L. Ackerman, Esq.
Fowler White Burnett, [REDACTED]

[REDACTED]

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, [REDACTED]

[REDACTED]

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

[REDACTED]

Jack A. Goldberger, Esq.
Atterbury, Goldberger & Weiss, [REDACTED]

[REDACTED]

Martin G. Weinberg, Esq.

[REDACTED]