

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 [REDACTED], individually,

Defendants.

NOTICE OF TAKING DEPOSITION

***Duces Tecum**

TO: All counsel on the attached Counsel List

PLEASE TAKE NOTICE that the undersigned attorneys will take deposition(s) of:

<u>NAME AND ADDRESS</u>	<u>DATE AND TIME</u>	<u>LOCATION</u>
Representative(s) of The Wackenhut Corporation with the most knowledge of the matters set forth below pursuant to Fla. R. Civ. P. 1.310(b)(6)	September 6, 2011 10:00 AM.	Searcy Denney Scarola Barnhart & Shipley, PA [REDACTED]

***DUCES TECUM: TO HAVE AND BRING WITH YOU AT THE TIME OF
THE DEPOSITION THE FOLLOWING:**

Any and all documents reflecting or relating to services rendered:**

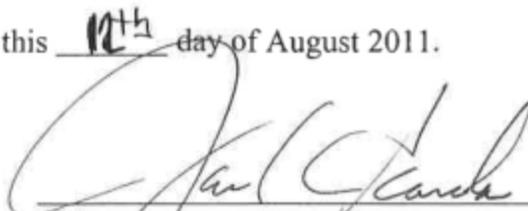
1. at or in the general vicinity of 358 El Brillo Way, Palm Beach, FL 33480-4730; and
2. for the benefit of or at the direction of Jeffrey Epstein and/or Jack Goldberger

including but not limited to documents reflecting when the services were performed, how long they were performed, the nature of the services, and by whom they were performed.

upon oral examination before Signature Court Reporting, Inc., a Notary Public, or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

***"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all Counsel on the attached list, this 12th day of August 2011.



Jack Scardola



Attorney for Defendant Edwards

cc: Signature Court Reporting
E-TRANSCRIPT, ASCII, CD AND/OR DVD REQUESTED

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]
Atterbury, Goldberger & Weiss, [REDACTED]
[REDACTED]

Attorneys for Jeffrey Epstein

Bradley Edwards

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL
[REDACTED]

Joseph L. Ackerman, Jr., Esquire

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Martin Weinberg, Esquire

Martin Weinberg, [REDACTED]
[REDACTED]

Attorneys for Jeffrey Epstein

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Defendants.



SUBPOENA DUCES TECUM FOR DEPOSITION

THE STATE OF FLORIDA

TO: The Representative(s) of The Wackenhut Corporation
with the most knowledge of the matters set forth below
pursuant to Fla. R. Civ. P. 1.310(b)(6)

YOU ARE COMMANDED to appear before a person authorized by law to take depositions at the offices of undersigned counsel **on Tuesday, September 6, 2011, at 10:00 AM**, for the taking of your deposition in this action. You are to have with you at the above place and time the following:

DUCES TECUM:

Any and all documents* reflecting or relating to services rendered:

1. at or in the general vicinity of 358 El Brillo Way, Palm Beach, FL 33480-4730; and
2. for the benefit of or at the direction of Jeffrey Epstein and/or Jack Goldberger

including but not limited to documents reflecting when the services were performed, how long they were performed, the nature of the services, and by whom they were performed.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

If you fail to appear, you may be in contempt of Court.

You are subpoenaed to appear by the following attorney and unless excused from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

DATED this 12th day of August 2011.



Jack Scarola
On Behalf of the Court

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



Attorneys for Defendant Edwards

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Krista Garber, Americans with Disabilities Act Coordinator, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Krista Garber Americans with Disabilities Act Coordinator, , por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacidad del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”