

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 ■■■■■, individually,

Defendant.

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**MOTION PURSUANT TO F.S. §57.105**

Defendant, ■■■■■, moves this Honorable Court for the imposition of sanctions pursuant to the provisions of F.S. §57.105 on the basis that the Plaintiff and his counsel knew or reasonably should have known that the Plaintiff's claims against ■■■■■, when initially presented to the court or subsequent thereto:

- a) were not supported by the material facts necessary to establish the claims and/or the defenses; or
- b) were not and would not be supported by the application of then existing law to those material facts.

Case No.: 502009CA040800XXXXMBAG  
Motion Pursuant to F.S. § 57.105

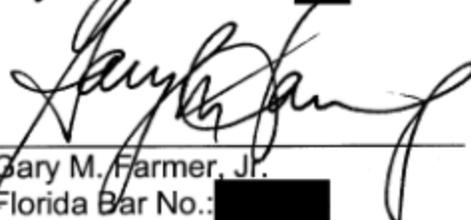
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail to all counsel on the attached list on ~~March~~ <sup>April</sup> 20, 2010.

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**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, PL**

[REDACTED]

*Attorneys for Defendant* [REDACTED].

By:   
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Gary M. Farmer, Jr.  
Florida Bar No.: [REDACTED]

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