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July 2, 2014

John R. Beranek, Esquire
AUSLEY & McMULLEN, P.A.
Post Office Box 391
Tallahassee, FL 32302

SENT VIA EMAIL
[REDACTED]

Re: Epstein v. Edwards

Dear John:

Mr. Epstein has agreed to your engagement on the terms set forth in your recent communication. I will ask that a \$5,000 retainer be forwarded to you under separate cover.

Enclosed please find a copy of Edwards' Notice of Appeal and Limited Directions to Clerk filed by Phil Burlington.

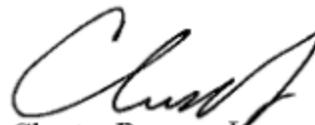
I have reviewed the Limited Directions and compared it to the docket sheet. Curiously they did not include docket entry #790 which is a Motion for Reconsideration filed by Edwards following the verbal granting of the Motion for Summary Judgment. They also have not included docket entry #798 which is Burlington's appellate brief filed in the First DCA.

There is one docket entry that must be included in the record on appeal. This is docket entry #791 which was a Notice of Filing a copy of the transcript of the hearing on our Motion for Summary Judgment. Upon review, you may find that additional items should be included in the record on appeal.

Mr. Epstein is still contemplating filing an amicus in Steinberg v. Steinberg.

Let me know if there is anything I can do to help.

Very truly yours,



W. Chester Brewer, Jr.

WCB/cg

Enclosure

cc: Jeffrey Epstein
Darren Indyke, Esquire
Jack A. Goldberger, Esquire



IN THE CIRCUIT COURT OF THE FIFTH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA.

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendants/Counter-Plaintiffs.

NOTICE OF APPEAL

NOTICE IS HEREBY GIVEN that the Defendant/Counter-Plaintiff,
BRADLEY J. EDWARDS, appeals to the Fourth District Court of Appeal of
Florida, the final order of this Court dated May 27, 2014, entered by the Honorable
Donald W. Hafele. The nature of the order is a Final Judgment.

*** FILED: PALM BEACH COUNTY, FL SHARON R BOCK, CLERK ***

I HEREBY CERTIFY that a true copy of the foregoing was furnished to all counsel on the attached service list, by email, on June 19, 2014.

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and

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Attorneys for Defendant Edwards
[REDACTED]

By: /s/ Philip M. Burlington
PHILIP M. BURLINGTON
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SERVICE LIST

Epstein v. Rothstein/Edwards

Case No. 502009CA040800XXXXMBAG

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

CIVIL DIVISION -AG

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

vs.

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

Defendants/Counter-Plaintiffs.



FINAL JUDGMENT

Pursuant to the Summary Judgment rendered in this action:

IT IS ADJUDGED that Counter-Plaintiff, BRADLEY J. EDWARDS, 425 N. Andrews Avenue, Suite 2, Ft. Lauderdale, FL 33301 (SS unknown) take nothing by this action and that Counter-Defendant, JEFFREY EPSTEIN, 6100 Red Hook Boulevard, Virgin Islands, shall go hence without day. The court reserves jurisdiction for the taxation of costs and if appropriate, the award of attorney's fees.

DONE AND ORDERED at West Palm Beach, Palm Beach County, Florida, this _____
day of _____, 2014.

SIGNED & DATED

MAY 27 2014

JUDGE DONALD W. HAFELE

CIRCUIT COURT JUDGE

Copies furnished to those on the attached service list.

SERVICE LIST

CASE NO. 502009CA040800XXXUMJ3-AG

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IN THE CIRCUIT COURT OF THE FIFTEENTH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA.

CASE NO. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendants/Counter-Plaintiffs.



**NOTICE OF APPEARANCE AND
DESIGNATION OF EMAIL ADDRESSES**

PHILIP M. BURLINGTON, ESQ., of the law firm of BURLINGTON & ROCKENBACH, P.A., files this Notice of Appearance on behalf of the Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, solely as appellate counsel in this cause, and directs all parties to forward copies of all pleadings to the undersigned.

SERVICE LIST

Epstein v. Rothstein/Edwards
Case No. 502009CA040800XXXXMBAG

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
AND FOR PALM BEACH COUNTY,
FLORIDA.

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendant/Counter-Plaintiffs.

LIMITED DIRECTIONS TO CLERK

Defendant, BRADLEY J. EDWARDS, pursuant to Fla.R.App.P.
9.200(a)(3), hereby directs the Clerk to only include in the Record-on-Appeal the
following documents:

1. DE-1 Complaint dated December 7, 2009;
2. DE-8 Answer and Counterclaim dated December 21, 2009;
3. DE-9 Answer and Counterclaim dated December 21, 2009;
4. DE-19 Order dated January 26, 2010;
5. DE-23 Motion to Dismiss dated February 26, 2010;
6. DE-35 Answer to Counterclaim dated March 26, 2010;

7. DE-36 Reply to Affirmative Defenses dated March 16, 2010;
8. DE-38 Motion for Judgment or Alternative Motion for Summary Judgment dated March 29, 2010;
9. DE-62 Order on Epstein's Motion for Judgment on the Pleadings dated May 11, 2010;
10. DE-102 Order of Dismissal dated August 10, 2010;
11. DE-117 Statement of Undisputed Facts dated September 22, 2010;
12. DE-118 Motion for Final Summary Judgment dated September 22, 2010;
13. DE-127 Motion for Leave to Assert Claim for Punitive Damages dated October 19, 2010;
14. DE-199 Motion for Reconsideration dated January 14, 2011;
15. DE-241 Agreed Order Granting Motion to Amend Complaint dated February 15, 2011;
16. DE-289 Order on Case Management Status date April 12, 2011;
17. DE-292 Amended Complaint dated April 13, 2011;
18. DE-295 Motion to Dismiss dated April 20, 2011;
19. DE-308 Reply in Opposition to Defendant/Counter-Plaintiff's Motion to Dismiss Amended Complaint dated May 13, 2011;
20. DE-346 Order Granting Defendant/Counter-Plaintiff's Motion to Dismiss Amended Complaint dated July 25, 2011;
21. DE-357 Second Amended Complaint dated August 22, 2011;
22. DE-360 Motion to Dismiss Second Amended Complaint dated August 22, 2011;

23. DE-374 Response in Opposition to Defendant/Counter-Plaintiff's Motion to Dismiss Corrected Second Amended Complaint dated September 22, 2011;
24. DE-375 Agreed Order Granting Defendant/Cross-Plaintiff's Ore Tenus Motion to Amend Counterclaim dated October 3, 2011;
25. DE-377 Amended Counterclaim dated October 4, 2011;
26. DE-378 Order on Motion to Dismiss Plaintiff's Second Amended Complaint dated October 4, 2011;
27. DE-380 Motion to Dismiss Amended Counterclaim dated October 21, 2011;
28. DE-383 Answer & Affirmative Defenses to Second Amended Complaint dated October 28, 2011;
29. DE-390 Renewed Motion for Final Summary Judgment dated November 4, 2011;
30. DE-393 Statement of Undisputed Facts dated November 7, 2011;
31. DE-402 Second Amended Counterclaim dated November 29, 2011;
32. DE-415 Motion to Dismiss Second Amended Counterclaim dated December 12, 2011;
33. DE-473 Order on Damages Claimed in Second Amended Counterclaim dated May 8, 2012;
34. DE-479 Third Amended Counterclaim dated May 21, 2012;
35. DE-486 Answer & Affirmative Defenses Counterclaim dated June 14, 2012;
36. DE-488 Reply to Affirmative Defenses dated June 19, 2012;
37. DE-490 Motion to Compel Proper Response to the Counterclaims dated June 19, 2012;

38. DE-493 Motion to Strike Motion to Compel Proper Answer or Deem Unanswered Allegations Admitted dated July 3, 2012;
39. DE-500 Order Granting Motion to Compel Proper Answer or Deem Unanswered Allegations dated July 24, 2012;
40. DE-502 Answer & Affirmative Defenses Counterclaim dated August 2, 2012;
41. DE-506 Motion to Continue Summary Judgment Hearing dated August 14, 2012;
42. DE-507 Order Denying Plaintiff's Motion to Continue Summary Judgment Hearing dated August 16, 2012;
43. DE-508 Notice of Voluntary Dismissal dated August 16, 2012;
44. DE-516 Motion to File Amendment to Third Amended Counterclaim dated August 29, 2012;
45. DE-522 Agreed Order Granting Motion to File Amendment to Third Amended Counterclaim dated September 5, 2012;
46. DE-523 Answer to Amendment to Paragraph 32 of Amended Counterclaim dated September 18, 2012;
47. DE-538 Motion for Order Granting Leave to Assert Claim for Punitive Damages Against the Counter-Defendant dated October 19, 2012;
48. DE-554 Response to Memorandum in Opposition to Second Renewed Motion for Leave to Assert Claim for Punitive Damages dated December 10, 2012;
49. DE-558 Order Granting Renewed Motion for Leave to Assert Claim for Punitive Damages dated December 18, 2012;
50. DE-560 Fourth Amended Counterclaim dated January 9, 2013;

51. DE-569 Motion to Dismiss Fourth Amended Counterclaim dated January 22, 2013;
52. DE-586 Order Dismissing Fourth Counterclaim dated February 11, 2013;
53. DE-589 Reply to Affirmative Defenses dated February 22, 2013;
54. DE-593 Answer & Affirmative Defenses dated February 26, 2013;
55. DE-639 Agreed Order on Plaintiff/Counter-Defendant's Motion to Bifurcate Trial dated August 19, 2013;
56. DE-673 Motion for Summary Judgment dated September 26, 2013;
57. DE-675 Affidavit of Jeffrey Epstein dated September 26, 2013;
58. DE-784 Response to Response in Opposition to Motion for Summary Judgment dated January 17, 2014;
59. DE-785 Notice of Filing Correction to Response in Opposition to Motion for Summary Judgment dated January 21, 2014;
60. DE-786 Reply to Defendant/Counter-Plaintiff's Response in Opposition to Motion for Summary Judgment dated January 22, 2014;
61. DE-792 Notice of Supplemental Authority in Support of Motion for Reconsideration filed February 7, 2014;
62. DE-800 Order Granting Counter-Defendant's Motion for Summary Judgment dated May 21, 2014;
63. DE-801 Order Denying Counter-Plaintiff's Motions for Reconsideration of The Order Granting Motion for Summary Judgment dated May 21, 2014;
64. DE-802 Final Judgment dated May 29, 2014.

STATEMENT OF JUDICIAL ACTS TO BE REVIEWED

The judicial act which Defendant/Counter-Plaintiff anticipates to be reviewed is the granting of Plaintiff/Counter-Defendant's Jeffrey Epstein's Motion for Summary Judgment on the Counterclaim.

I HEREBY CERTIFY that a true copy of the foregoing was furnished to all counsel on the attached service list, by email, on June 30, 2014.

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Case No. 502009CA040800XXXXMBAG

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