

Discovery Request to Edwards and Response

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/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

**PLAINTIFF, JEFFREY EPSTEIN'S NOTICE OF PROPOUNDING FIRST SET
OF EXPERT WITNESS INTERROGATORIS AND REQUEST TO PRODUCE EXPERT
REPORTS TO DEFENDANT/COUNTER-PLAINTIFF, BRADLEY J. EDWARDS**

Plaintiff/Counter-Defendant, Jeffrey Epstein, by and through his undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, files this his Notice of Propounding First Set of Expert Witness Interrogatories and Request to Produce Expert Reports directed to Defendant/Counter-Plaintiff, Bradley J. Edwards' numbered 1 through 13 and Request to Produce Expert Reports numbered 14-16 to respond to within the time prescribed by the Fla.R.Civ.Pro..

CERTIFICATE OF SERVICE

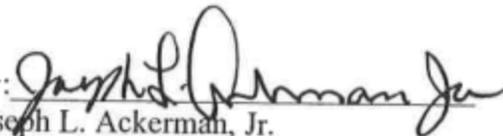
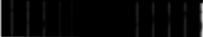
I HEREBY CERTIFY that a true and correct copy of the foregoing has been duly furnished via Email, Facsimile, U.S. Mail, Hand Delivery, Federal Express this 4th day of November, 2010 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

Epstein's NOS of Expert Int to Edwards and RTP Experts Reports

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik
One E. Broward Blvd., Suite 700
Ft. Lauderdale, FL 33301

By: 
Joseph L. Ackerman, Jr.
Fla. Bar No. 235954
FOWLER WHITE BURNETT P.A.
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: 
Facsimile: 

Attorneys for Jeffrey Epstein, Plaintiff/
Counter-defendant

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

10. If so, please state:

- a. Whether the expert was self-employed, employed by someone else or associated as a partner.
- b. Each address where the expert practiced or was employed.
- c. The dates the expert was with each employer.
- d. The type of duty the expert performed with each employer.

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?

Epstein's NOS of Expert Int to Edwards and RTP Experts Reports

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.

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?
 - 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.

State of _____)
County of _____)

The foregoing instrument was acknowledged before me this ____ day of _____,
2010 by _____, who is personally to me or who has produced
_____ as identification and who did did/not take an oath.

(SEAL)

(Notary Signature)

(Print Notary Name)

Notary Public, State of _____

(Serial Number, if any)

Edwards' Response

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

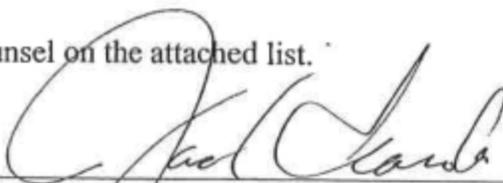
Defendant(s).

NOTICE OF SERVING ANSWERS TO FIRST SET
OF EXPERT WITNESS INTERROGATORIES AND
REQUEST TO PRODUCE EXPERT REPORTS

COMES NOW the Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, and hereby files this Notice with the Court that Answers to the First Set of Expert Interrogatories propounded by the Plaintiff, Jeffrey Epstein, on November 4, 2010, have been furnished to the attorney for the Plaintiff.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this 2nd day of December, 2010 to all counsel on the attached list.

FAX AND
7



JACK SCAROLA
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, ■■■
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: ■■■■■■■■■■
Fax: ■■■■■■■■■■
Attorney for Bradley J. Edwards

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Answers to Expert Interrogatories

COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, P.A.
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: [REDACTED]
Fax: [REDACTED]

Marc S. Nurik Esquire
Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

ANSWERS TO 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: Bradley Edwards has not retained any experts at this time. However, it is expected that some or all of the attorneys who have prosecuted civil claims against Jeffrey Epstein arising out of his abuse of children will be called to testify on behalf of Edwards and may express opinions regarding the services rendered by Edwards on behalf of his clients.

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: N/A

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

Answer: N/A

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

Answer: N/A

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

Answer: N/A

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: N/A

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

Answer: N/A

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

Answer: N/A

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

Answer: N/A

10. If so, please state:

- a. Whether the expert was self-employed, employed by someone else or associated as a partner
- b. Each address where the expert practiced or was employed
- c. The dates the expert was with each employer
- d. The type of duty the expert performed with each employer

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: N/A

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?

Answer: N/A

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?

Answer: N/A

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

Answer: N/A

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

Answer: N/A

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

Answer: N/A



Signature of Answering Party

STATE OF FLORIDA)

COUNTY OF PALM)
BEACH

The foregoing instrument was acknowledged before me this 2ND day of December, 2010 by JACK SCAROLA who is personally known to me or who has produced _____ (type of identification) as ~~identification~~ and who did/~~did not~~ take an oath.



Notary Public
State of Florida at Large
My Commission expires:
Commission No:



Discovery Request to Edwards and Response

CIVIL DIVISION
CASE NO. 502009CA040800XXXXMBAG
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

**NOTICE OF PROPOUNDING INTERROGATORY
TO DEFENDANT, BRADLEY J. EDWARDS**

Plaintiff, Jeffrey Epstein, hereby provides notice that pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, that one (1) Interrogatory has been directed to Defendant, Bradley J. Edwards, this 16th day of May, 2011.

It is requested that the aforesaid answers be served within thirty (30) days at the offices of Fowler White Burnett, Phillips Point, West Tower, 777 South Flagler Drive, Suite 901, West Palm Beach, Florida 33401.

Epstein v Rothstein, Edwards, etc
CASE NO. 502009CA040800XXXXMBAG
Plaintiff's Notice of Propounding Interrogatory to Bradley J. Edwards

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by

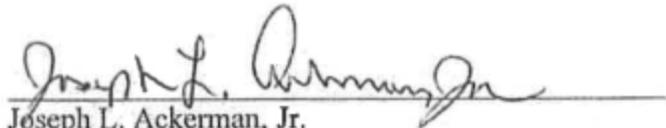
U.S. Mail this 16th day of May, 2011 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

Jack A. Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

Marc S. Nurik, Esq.
Law Offices of Marc S. Nurik
One E. Broward Blvd., Suite 700
Ft. Lauderdale, FL 33301

Respectfully submitted,



Joseph L. Ackerman, Jr.

Fla. Bar No. 235954

Email: [REDACTED]m

FOWLER WHITE BURNETT, [REDACTED]
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: [REDACTED]
Facsimile: [REDACTED]

W:\80743\NOTOSI79-Not of Interrogatory to Def. Edwards-JLA.docx

By: _____
BRADLEY J. EDWARDS

STATE OF FLORIDA)
) ss.
COUNTY OF _____)

Being first duly sworn, _____, who is personally known to me
or who has produced _____ (type of identification), deposes and
says that the attached Answer to Interrogatory are true and correct in all respects.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2011.

Notary Public

Name of Notary (Print or Type)

My commission expires: _____

Edwards' Response

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

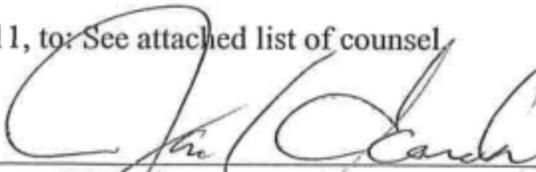
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

DEFENDANT, BRADLEY J. EDWARDS' NOTICE OF SERVING
ANSWERS TO INTERROGATORIES

COMES NOW the Defendant, Bradley J. Edwards, by and through undersigned counsel,
and hereby provides Notice with the Court that Answers to Interrogatories propounded by the
Plaintiff, Jeffrey Epstein, on May 16, 2011, have been furnished to the attorney for the Plaintiff.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by mail this
10th day of June, 2011, to: See attached list of counsel.



JACK SCAROLA

Florida Bar No.: 169440

Searcy Denney Scarola Barnhart & Shipley, ■

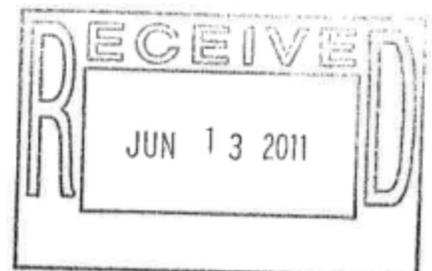
2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: ■

Fax: ■

Attorney for Plaintiff(s)



ANSWERS TO INTERROGATORIES

1. As to every act characterized by the Defendant, Bradley J. Edwards an alleged "abuse of process" by Jeffrey Epstein, state the following:

a. An exact and detailed description of the "process" including the title of all pleadings or other documents which the Plaintiff contends were abusive;

ANSWER: Every pleading, motion, notice, and discovery request served by the Plaintiff on Bradley Edwards in this case.

b. The date on which each alleged abuse occurred;

ANSWER: The date of service of each of the above as reflected on the Certificate of Service of each.

c. The exact nature of the damage suffered by the Defendant, Bradley J. Edwards as a consequence of this abuse;

ANSWER: Emotional distress, embarrassment, mental anguish, humiliation, loss of reputation and standing in the community, loss of the value of the time expended in defense of and in responding to the abuse process, attorneys fees and costs.

d. The amount of the damage alleged to have been caused by the abuse.

ANSWER: A total in excess of \$1 Million. The exact amount is unliquidated and subject to determination by a jury.

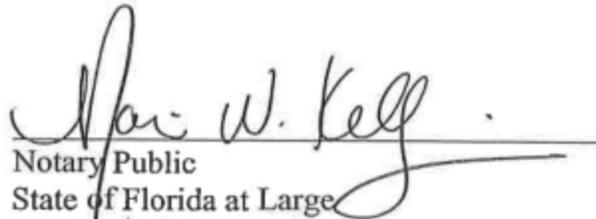


Signature of Answering Party

STATE OF)

COUNTY OF)

The foregoing instrument was acknowledged before me this 26th day of May, 2011 by Brad Edwards who is personally known to me or who has produced _____ (type of identification) as identification and who did/did not take an oath.



Notary Public
State of Florida at Large
My Commission expires:
Commission No:

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]
Atterbury, Goldberger & Weiss, [REDACTED]
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Joseph L. Ackerman, Jr., Esquire
jla@fowler-white.com
Fowler White Burnett, P.A.
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Marc S. Nurik
[REDACTED]
Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: (954)-745-3556
Attorneys for Scott Rothstein

Martin Weinberg, Esquire
Martin Weinberg, [REDACTED]
20 Park Plaza, Suite 1000
Suffolk, MA 02116
Phone:
Fax:
Attorneys for Jeffrey Epstein

Discovery Request to Edwards and Response

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

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

EPSTEIN'S FIRST REQUEST FOR ADMISSIONS TO EDWARDS

Plaintiff, JEFFREY EPSTEIN, pursuant to Fla. R. Civ. P. 1.370, requests that Defendant, BRADLEY J. EDWARDS ("Edwards" and/or "You" and/or "Your") admit or deny the following:

1. Admit that in Your March 23, 2010 deposition You testified under oath (at page 12), there are only three cases in existence against Jeffrey Epstein in which You represent a plaintiff (Jane Doe, L.M. and [REDACTED]).
2. Admit that the testimony described in Request No. 1 is false.
3. Admit that in Your March 23, 2010 deposition you testified under oath You only filed three cases against Jeffrey Epstein.
4. Admit that the testimony described in Request No. 3 is false.
5. Admit that the Motion to Proceed Anonymously (DE #3) asserted that L.M. "was an identified victim by the FBI and U.S. Attorney's office in a criminal investigation against the Defendant, Jeffrey Epstein."

6. Admit that the assertion in Request No. 5 is false.

7. Admit that in paragraph 8 of Your answer to the Complaint in this action, You asserted that "RRA never filed a lawsuit on behalf of L.M."

8. Admit that the assertion described in Request No. 7 is false.

9. Admit that in paragraph 8 of Your answer to the Complaint in this action, You asserted that lawsuits filed on behalf of L.M. and other victims "were filed by EDWARDS prior to any association with or knowledge of RRA."

10. Admit that the assertion described in Request No. 9 is false.

11. Admit that in paragraph 9 of the Complaint (DE #1) in Case No. 09-CV-81092 it is alleged that Epstein "coerc[ed] or forc[ed] the then-minor L.M. to perform oral sex on him."

12. Admit that the allegations described in Request No. 11 are false.

13. Admit that in paragraph 17 of Your answer to the Complaint in this action, You admitted that "[r]elevant to this action, EPSTEIN is currently named as a defendant in three civil actions alleging, inter alia, sexual assault and battery that were handled by RRA and its attorneys including EDWARDS prior to its implosion – one of which is filed in federal court (Jane Doe v. Epstein, Case No. 08-CIV-80893, U.S.D.C. S.D. Fla.)(Jane Doe is a named Defendant herein), and two of which have been filed in state court in the 15th Judicial Circuit Court, Palm Beach County, State of Florida, (L.M. v. Epstein, Case No. 502008CA028051XXXXMB AB; █████. v. Epstein, Case No. 502008CA028058XXXXMB AB), (hereinafter collectively referred to as the "Civil Actions," and L.M is a named Defendant herein). The Civil Actions were all filed in August and September of 2008."

14. Admit that Scott Rothstein was involved in the decision to file the Complaint

(DE #1) in Case No. 09-CV-81092.

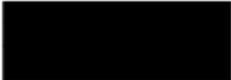
15. Admit that Russell Adler was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

16 Admit that in her September 24, 2009 deposition L.M. testified under oath (at page 71), that she never had oral sex with Epstein.

17. Admit that You caused to be filed a Complaint (DE #1) on behalf of L.M. in the case styled L.M. v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division on July 24, 2009. A copy of the Complaint is attached as **Exhibit A**.

18. Admit that a Complaint (DE #1) was filed on behalf of L.M. in the case styled L.M. v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division, under Your name, Florida Bar number and e-mail address while you were employed by Rothstein, Rosenfeldt & Adler ("RRA").

19. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 is two hundred thirty-four (234) pages, contains six hundred forty-four (644) paragraphs and one hundred fifty-six (156) counts.

20. Admit that in Your March 23, 2010 deposition You testified under oath (at page 226) that You had no other professional e-mail addresses while at RRA except 


21. Admit that a Motion to Keep True Name Sealed in Envelope (DE #2) was filed in Case No. 09-CV-81092 under Your name, Florida Bar number and e-mail address.

22. Admit that a Motion to Proceed Anonymously (DE #3) was filed on behalf of L.M. in Case No. 09-CV-81092 under Your name, Florida Bar number and e-mail address.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 18 day of June, 2010:

Gary M. Farmer, Jr., Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
[REDACTED] - fax
Attorneys for Defendant, L.M.

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401-5012
Fax: [REDACTED]
Co-Counsel for Defendant Jeffrey Epstein

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
686-6300
383-9424 F
Attorneys for Defendant Bradley Edwards

MARC S. NURIK, ESQ.
Law Offices of Marc S. Nurik
One East Broward Boulevard
Suite 700
Fort Lauderdale, FL 33301
[REDACTED] Fax
Attorneys for Defendant Scott Rothstein

FWLER WHITE BURNETT, [REDACTED]
Attorneys for Plaintiff, Jeffrey Epstein
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131
[REDACTED] fax

By: _____

Lilly A. Sanchez, Esq.
Florida Bar No. 195677

Edwards' Response

#291874/mep

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
L.M., individually,

Defendant,

EDWARDS' RESPONSE TO FIRST REQUEST FOR ADMISSIONS

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, hereby files his Response to Plaintiff, JEFFREY EPSTEIN'S First Request for Admissions to Edwards dated June 18, 2010 as follows:

1. Denied. The transcript is accurate but Request for Admission No. 1 does not accurately describe the testimony.
2. Denied. A Complaint was filed in Federal Court against Jeffrey Epstein on behalf of L.M., but never served.
3. Denied.
4. Denied on the grounds that no such testimony was given.
5. Admitted.
6. Denied.
7. Admitted.

8. Denied. While a second Complaint was filed in Federal Court on behalf of L.M., it was never served and, therefore, RRA never prosecuted a lawsuit on behalf of L.M. except for the suit filed prior to Edwards' association with RRA.

9. Admitted.

10. Denied. See response to Request for Admission No. 8.

11. Admitted.

12. Admitted. This allegation which is accurate as to [REDACTED] was mistakenly carried over to L.M. in the drafting of the Complaint on behalf of L.M.

13. Admitted.

14. Denied.

15. Denied.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

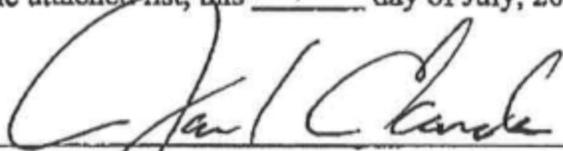
23. Admitted.

24. Admitted.

25. Admitted.

- 26. Admitted.
- 27. Admitted.
- 28. Admitted.
- 29. Admitted.
- 30. Denied.

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, this 7th day of July, 2010.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, ■
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: ■
Fax: ■
Attorneys for Bradley J. Edwards

COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, [REDACTED]
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Farmer, Jaffe, Weissing, Edwards, Pistos &
Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Lilly Ann Sanchez, Esquire
[REDACTED]
Fowler White Burnett, [REDACTED]
777 S Flagler Drive, Suite 901
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Scott Rothstein

Discovery Request to Edwards and Response

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,

v.

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

Defendants.

COPY
RECEIVED FOR FILING
APR 12 2011
SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

PLAINTIFF'S REQUEST FOR PRODUCTION OF APRIL 7, 2011

Plaintiff Jeffrey Epstein, pursuant to Rule 1.350, Fla. R.Civ. P., requests that defendant Bradley J. Edwards, produce for inspection and copying the documents identified below within the time limits provided by the Rule at the office of the undersigned.

I. DEFINITIONS AND INSTRUCTIONS

1. "Document" means any document known to you and every such document which can be located or discovered by reasonably diligent efforts; any original or copy of such in your custody, possession or control, including, but not limited to, any printed, written, recorded, taped, electronic (e-mails), graphic, or other tangible matter from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original, all amendments and addenda and any non-identical copy (whether different from the original because of notes made on or attached to such copy or otherwise) of any and all writings, correspondence, letters, telegrams, facsimile communications, cables, notes, notations, papers, newsletters, memoranda, inter-office communications, releases, agreements, contracts, books, pamphlets, studies, minutes of meetings, recordings or other memorials of any type of personal or telephone conversations, meetings or conferences (including, but not limited to, telephone bills and long distance charge slips), reports, analyses, evaluations, estimates, projections, forecasts, receipts, statements, accounts, books of account, diaries, calendars, desk pads, appointment books, stenographer's notebooks, transcripts, ledgers, registers, worksheets, journals, statistical records, cost sheets, summaries, lists, tabulations, digests, cancelled or uncanceled checks or drafts, vouchers, charge slips, invoices, purchase orders, accountant's reports, financial statements, newspapers, periodical or magazine materials, and any material underlying, supporting or used in the preparation of any documents or record whatsoever.

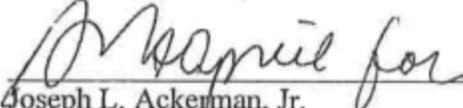
2. "Referring to", "reflecting", "supporting", "evidencing" or "relates to" means in any way directly or indirectly, concerning, disclosing, describing, confirming, or representing.
3. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.
4. "Epstein" means the Plaintiff.
5. "Defendant", "you" and/or "Edwards" means Bradley J. Edwards and agent or attorney for him and any other person acting or purporting to act for, or on behalf of Edwards or under Edwards's authority or control.
6. "Complaint" refers to the initial pleading or Complaint filed by Plaintiff in this action and any amended pleadings.
7. All other terms are defined as they are in the Complaint.
8. Any document as to which a claim of privilege is or will be asserted should be identified by author, signatory, description (e.g., letter, memorandum, facsimile, recording, etc.), title (if any), date, addresses (if any), general subject matter, present depository and present custodian and a complete statement of the ground for the claim of privilege should be set forth.
9. If you maintain that any document that is requested has been destroyed, set forth the contents of the document, the date of such destruction and the name of the person who authorized or directed such destruction.
10. If any of the documents requested cannot be produced in full, produce to the extent possible, specifying the reasons for the inability to produce the remainder.
11. In responding to the following document requests, please specify which documents are responsive to each request and, where appropriate, to each sub-part thereof.
12. This request is a continuing one. If after producing documents, you become aware of any further responsive documents, you are requested to produce such additional documents.
13. If you maintain that documents responsive to any Request contained herein have previously been produced in response to an earlier Request, so state and provide the bate-number if so numbered.
14. Unless otherwise stated, the time period for this request is from May 1, 2010 through the date of service.

REQUESTS

1. All documents reflecting any allegedly public statements made by Plaintiff regarding "his criminal activity" as referenced by counsel to Defendant Edwards in an email of March 14, 2011 to Plaintiff's counsel Ackerman.
2. All documents reflecting or tending to support Defendant Edwards's position that Plaintiff waived his Fifth Amendment rights under the U.S. Constitution.
3. All documents reflecting or tending to support Defendant Edwards's position that Plaintiff has lost his Fifth Amendment rights by operation of law or otherwise except by waiver.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 7th day of April, 2011 to Gary M. Farmer, Jr., Esq., Farmer, Jaffee, Weissing, Edwards, Fistos, et al, 425 N. Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; and Jack Scarola, Esquire, Searcy Denney Scarola et al., 2139 Palm Beach Lakes Boulevard, P.O. Drawer 3626, West Palm Beach, FL 33409.



Joseph L. Ackerman, Jr.
Fla. Bar No. 235954

FOWLER WHITE BURNETT, ■
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: ■
Facsimile: ■

Edwards' Response

#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).

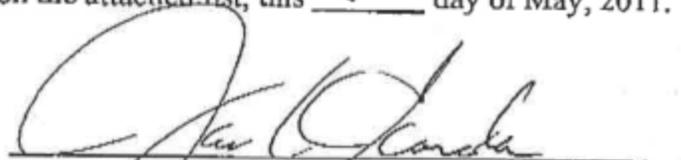
**BRADLEY EDWARDS' RESPONSE TO PLAINTIFF'S
REQUEST TO PRODUCE OF APRIL 7, 2011**

Defendant/Counter-plaintiff, Bradley J. Edwards, by and through his undersigned attorneys and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Plaintiff, JEFFREY EPSTEIN's, Request to Produce dated April 7, 2011 as follows:

1. Objection. The identification of specific public statements made by Epstein is protected by the attorney work product privilege.
2. Objection. The identification of documents "reflecting or tending to support" legal positions taken on behalf of the Defendant is protected by the attorney work product privilege.
3. Objection. The identification of documents "reflecting or tending to support" legal positions taken on behalf of the Defendant is protected by the attorney work product privilege.

Edwards adv. Epstein, et al.
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and/or U.S. Mail to all Counsel on the attached list, this 5th day of May, 2011.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, ■■■
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: ■■■■■■■■■■
Fax: ■■■■■■■■■■
Attorney for Bradley J. Edwards

Edwards adv. Epstein, et al.
Case No.: 502009CA040800XXXXMBAG
Plaintiff(s) Response to Request to Produce

COUNSEL LIST

Martin Weinberg, Esquire
Martin Weinberg, [REDACTED]
Attorney For: Jeffrey Epstein
20 Park Plaza, Suite 1000
Suffolk, MA 02116

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, [REDACTED]
Attorney For: Jeffrey Epstein
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]

Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
Attorney For: Jeffrey Epstein
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Marc S. Nurik
Law Offices of Marc S. Nurik
Attorney For: Scott Rothstein
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, [REDACTED]
Attorney For: Jeffrey Epstein
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: [REDACTED]
Fax: [REDACTED]