

TONJA HADDAD, PA

September 26, 2013

Via Electronic Mail

Jack Scarola, Esq.
Searcy Denney *et al.*

Re: *Epstein v. Edwards et al.*

Mr. Scarola:

As discussed, the items listed below (numbered as they appear on your exhibit list) were never provided to us during discovery in this matter. Please advise if you agree that you will not use this substantial (and irrelevant) list of items, or if we need to address it in our Motion in Limine. Back on April 23, 2013, you were served with the following request as listed on Schedule A to Brad's deposition notice:

12. Copies of any and all documents you intend to introduce at trial in support of the allegations made by you in your Fourth Amended Counterclaim you filed in this matter.

At the hearing on your Motion for Protective Order on June 10, 2013, you told the judge specifically that you were providing all items responsive to that request:

7 The last one is copies of any and all
8 documents you intend to introduce at trial in
9 support of the allegations made by you in the
10 fourth amended counterclaim. Again, we are
11 giving them all the evidence that we intend to
12 rely upon.

See Transcript of June 10, 2013 hearing, p. 27, which is attached to this letter.

4. Video of Jeffrey Epstein's home and route from victim to Epstein's home
9. Documents related to Jeffrey Epstein produced by Alfredo Rodriguez
11. Jeffrey Epstein phone records
12. [REDACTED] phone records

15. All probable cause affidavits related to criminal investigation of Jeffrey Epstein
16. All evidence, information and documents taken or possessed by FBI related to criminal investigation of Jeffrey Epstein
17. Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein
18. Video of Search Warrant of Jeffrey Epstein's home being executed
19. Application for Search Warrant of Jeffrey Epstein's home
27. Yearbooks of Jane Doe
28. 2002 Royal Palm Beach High School Year Book
29. 2001 Royal Palm Beach High School Year Book
30. 2003 Palm Beach Gardens High School Year Book
31. Affidavit and Application for Search Warrant on Jeffrey Epstein's home
32. Tape recording or transcript of recording of conversation between Jeffrey Epstein and George Rush
33. Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation
39. All statements made by Jeffrey Epstein
40. List of properties and vehicles in Larry Visoski's name
50. Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.
51. Photos of all of Jeffrey Epstein's properties, cars, boats and planes
52. Probable Cause Affidavits prepared against Jeffrey Epstein and [REDACTED]
53. Audio tape of [REDACTED]
54. Photographs, videos and books taken in the search warrant of Jeffrey Epstein's home
55. Documents related to or evidencing Jeffrey Epstein's donations to law enforcement

56. Victim Notification Letter from US Attorney's Office to Victim
57. Expert Dr. L. Dennison Reed's Report of Victim
59. All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein
60. All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein
61. Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs
62. Passenger lists for flights taken by Jeffrey Epstein
63. Letter from Jeffrey Epstein to Alberto Pinto regarding house island project
65. MC2 emails involving communications of Jeffrey Epstein, Jeff Puller, [REDACTED] Pappas Suat, Jean Luc Brunel and Amanda Grant
68. Massage Table
69. Lotions taken from Jeffrey Epstein's home during search warrant
70. Computers taken from Jeffrey Epstein's home during search warrant
71. Vibrators, dildos and other sex toys taken from Jeffrey Epstein's home during search warrant
77. CAD calls to 358 El Brillo Way, Palm Beach FL 33480
80. Letter from Chief [REDACTED] to [REDACTED]
82. Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06
83. Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06
84. Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06
85. Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06
86. Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06
87. Letter from Goldberger dated 6-22-06

88. All subpoenas issued to State Grand Jury
89. Documents related to the rental of a vehicle for [REDACTED]
90. Ted's Sheds Documents
91. Documents related to property searches of Jeffrey Epstein's properties
92. Arrest Warrant of [REDACTED]
93. Police report regarding [REDACTED] picking up money dated 11-28-04
94. List of Trilateral Commission Members of 2003
96. Guy Fronstin letter dated 4-17-06
100. Victim's GED testing information and results
101. JEGE, Inc. Passenger Manifest
102. Hyperion Air Passenger Manifest
103. Flight information for [REDACTED]
104. Passenger List Palm Beach flights 2005
105. Jeffrey Epstein notepad notes
108. [REDACTED] letter to [REDACTED] dated 5-1-06
110. [REDACTED] Police Report dated 11-28-04
111. Compulsory Medial Examination of victim, CMA
112. Victim's school records and transcripts
113. Victim Notification letter dated 7-9-08
114. Victim's employment records from IHOP
115. Police report of Juan Alessi theft at Jeffrey Epstein's home
116. Victim's Medical Records from Milton Girls Juvenile Facility
117. Victim's Medical Records from Dr. Randee Speciale

118. Victim's Medical Records from Wellington Regional Hospital
119. Victim's Medical Records from St. Mary's Medical Center
120. Victim's Medical Records from United Health
121. All surveillance conducted by law enforcement on Jeffrey Epstein's home
122. Emails received from Palm Beach Records related to Jeffrey Epstein
123. All items listed on the Palm Beach Police Property Report Lists
124. All items taken in the execution of the search warrant of Jeffrey Epstein's home:
358 El Brillo Way, Palm Beach FL 33480
127. All documents produced by Palm Beach Police Department prior to the
deposition of Detective Recarey
128. Photographs of all persons listed on Victims' Witness Lists
129. Statements, deposition transcripts, videotaped depositions and transcripts taken
in connection with this and all related cases and exhibits thereto
130. Any and all expert witness reports and/or records generated in preparation for
this litigation by any party to this cause
132. Curriculum vitae of Dr. Ryan Hall
133. Any articles or publications of Dr. Ryan Hall
134. Any articles or publications of Dr. Richard Hall
135. Any articles or publications of Dr. L. Dennison Reed
136. All items and documentation review by Dr. L. Dennison Reed
137. Transcript and video (DVD) of IME of Victims
138. All exhibits to Dr. L. Demlison Reed's Deposition
139. All exhibits to Dr. Richard Hall's Deposition
140. All items and documents reviewed by Dr. Richard Hall
141. All items and documents reviewed by Dr. Ryan Hall

142. Demonstrative aids and exhibits including, but not limited to, anatomical charts, diagrams and models, surveys, photographs and similar material including blow-ups of the foresaid items.-

143. Any and all mortality tables

By notifying you of this defect pursuant to our requirement that we try to resolve discovery issues before we bring them before the court, we are in no way agreeing to their validity, relevancy, or admissibility in any way. We are further not waiving the right to assert any and all objections to these items as permitted by law.

Sincerely,
TONJA HADDAD, PA



Tonja Haddad Coleman
for the firm

cc: Parties on Service List

1 I skipped over number 9, copies of any
2 and all receipts, reports, invoices or other
3 documents evidencing treatment for your mental
4 anguish, embarrassment, anxiety, as alleged in
5 your counterclaim, there has been no formal
6 treatment, we have already told them none.

7 The last one is copies of any and all
8 documents you intend to introduce at trial in
9 support of the allegations made by you in the
10 fourth amended counterclaim. Again, we are
11 giving them all the evidence that we intend to
12 rely upon.

13 So the motion for protective order is
14 directed principally to number 1, number 2,
15 number 3, number 4, as it relates to anything
16 other than attorney's fees awards for Bradley
17 Edwards, and number 5 and the partnership
18 agreement in number 6.

19 So, understanding what we are claiming
20 and the fact that they are entitled to test
21 our claim, the answer to the question Your
22 Honor asks is, yes, they are entitled to test
23 our claim that this is the amount of time that
24 Brad Edwards devoted to the defense of this
25 case, but they haven't asked for anything that