

5/19

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).

NOTICE OF HEARING

YOU ARE HEREBY NOTIFIED that the undersigned has called up for hearing the following:

DATE: May 19, 2011

TIME: 9:30 a.m.

JUDGE: Honorable David F. Crow Palm Beach County Courthouse)

PLACE: 205 N. Dixie Highway, West Palm Beach, FL 33401

ROOM #: 9-C

SPECIFIC MATTERS TO BE HEARD:

Defendant/Counterplaintiff, Edwards' Motion to Dismiss

***In accordance with the Americans with Disabilities Act, persons in need of a special accommodation to participate in this proceeding, contact the Court Administrator's office not later than seven (7) days prior to the proceedings. If hearing impaired, contact (TDD) 1-800-955-8771, or (V) 1-800-955-8770 via Florida Relay.**

Edwards adv. Epstein
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Notice of Hearing

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#291874/mep

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JEFFREY EPSTEIN,

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Defendant(s).

MOTION TO DISMISS

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, moves this Honorable Court to dismiss the Complaint against him for failure to state a cause of action and in support thereof would show:

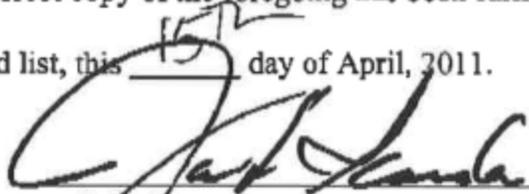
1. the "Introduction" to the Amended Complaint is nothing more than conclusory surplusage apparently intended to defame Mr. Edwards under the protection of the litigation privilege;
2. the Amended Complaint fails to identify the "process" alleged to be abusive, on whom it is claimed to have been served, or when it is claimed to have been served;
3. the Amended Complaint fails to articulate a cognizable theory of damages proximately caused by any wrongdoing on the part of Bradley Edwards;
4. the Amended Complaint fails to identify any conduct outside the protection of the litigation privilege which could give rise to any liability on the part of Bradley Edwards;

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5. all legal arguments and authorities as contained in the Defendant's previously filed Motion for Summary Judgment are incorporated by reference.

WHEREFORE, BRADLEY J. EDWARDS, demands dismissal of the Amended Complaint against him.

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 15 day of April, 2011.



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