

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.

FILED
2010 MAY 12 PM 3:21
SHARON R. SOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

**DEFENDANT BRADLEY J. EDWARDS RESPONSE TO PLAINTIFF'S REQUEST
FOR PRODUCTION DATED APRIL 12, 2010**

Defendant, BRADLEY J. EDWARDS, hereby files his Response to Request for
Production propounded by Plaintiff on April 12, 2010 as follows:

1. None.
2. a. Objection, relevance, not reasonably calculated to lead to the
discovery of admissible evidence.
b. None.
3. Objection as to communications to or from investigators as that is
protected by the work-product and /or attorney-client privilege.
4. Objection; any such communications are protected by the work-product
and /or attorney-client privilege.
5. None.
6. Objection, relevance, not reasonably calculated to lead to the
discovery of admissible evidence; vague; overbroad, without waiving
objection, there are no fee agreements with any investor.

7. None.
8. None.
9. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
10. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
11. None.
12. None.
13. None.
14. None.
15. None.
16. None.
17. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence; vague; overbroad, ambiguous.
18. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
19. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence and protected by the work-product privilege.
20. Objection, vague overbroad and any and all such documents are protected by the work-product privilege.
21. Objection, vague overbroad and any and all such documents are protected by the work-product and attorney-client privilege.
22. Not yet determined.

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23. Objection.
24. Objection; attorney-client privilege and/or work-product privilege.
25. None in Defendant's possession.
26. None.
27. None in Defendant's possession.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been
furnished via ^{FAX AND} U.S. Mail to all counsel on the attached list on ~~April~~ ^{MAY 11th}, 2010.

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By: 
Jack Scarola
Florida Bar No.: 162440

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