

36-41
5/16

#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).

REQUEST TO PRODUCE TO JEFFREY EPSTEIN

Defendant/Counter-Plaintiff, Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff/Counter Defendant, Jeffrey Epstein, produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

1. All documents* constituting, reflecting, or relating to communications between Plaintiff or any agent of Plaintiff, on the one hand, and William Scherer, or any person associated with William Scherer in the practice of law, any prosecuting, law enforcement, and/or government entity which communication relates directly or indirectly to any allegation of illegal activity or tortuous conduct in which Epstein is alleged to have engaged.

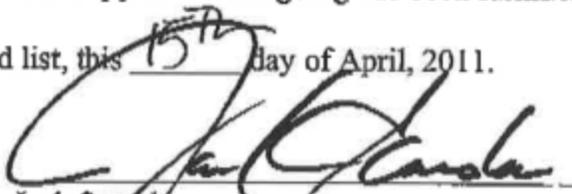
*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Request to Produce to Jeffrey Epstein

whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, [REDACTED], 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

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 15th day of April, 2011.



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

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Request to Produce to Jeffrey Epstein

COUNSEL LIST

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

Farmer, Jaffe, Weissing, Edwards, Fistos &
Learman, 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, P.A.
Attorney For: Jeffrey Epstein
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: [REDACTED]
Fax: [REDACTED]