

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,

Defendants.



NOTICE OF TAKING DEPOSITION

***Duces Tecum**

TO: All counsel on the attached Counsel List

PLEASE TAKE NOTICE that the undersigned attorneys will take deposition of:

<u>NAME AND ADDRESS</u>	<u>DATE AND TIME</u>	<u>LOCATION</u>
Donnie D. Ingram	February 25, 2011 10:00 a.m.	Searcy Denney Scarola Barnhart & Shipley, PA 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409

***Duces Tecum: to have and bring with you at the time of the deposition the following:**

Any and all documents reflecting or relating to services rendered:

- 1. at or in the general vicinity of 358 El Brillo Way, Palm Beach, FL 33480-4730; and**
- 2. for the benefit of or at the direction of Jeffrey Epstein and/or Jack Goldberger.**

upon oral examination before a Court Reporter, a Notary Public, or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the

purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all Counsel on the attached list, this 16th day of February 2011.



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

cc: Court Reporter

E-TRANSCRIPT, ASCII, CD AND/OR DVD REQUESTED

AMERICANS WITH DISABILITIES ACT

In accordance with the Americans With Disabilities Act, persons in need of a special accommodation to participate in this proceeding should contact the Human Resources Manager, Searcy Denney Scarola Barnhart & Shipley, P.A., no later than seven days prior to the proceeding. Please telephone [REDACTED]

COUNSEL LIST

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Attorneys for Jeffrey Epstein

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Attorneys for Jeffrey Epstein

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Attorneys for Scott Rothstein



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JEFFREY EPSTEIN,

CASE NO: 502009CA040800XXXXMBAG

Plaintiff,

vs.

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

Defendants.

SUBPOENA DUCES TECUM FOR DEPOSITION

THE STATE OF FLORIDA

**TO: Donnie D. Ingram
c/o The Wackenhut Corporation
4200 Wackenhut Drive
Suite 100
Palm Beach Gardens, FL 33410-4242**

YOU ARE COMMANDED to appear before a person authorized by law to take depositions at the offices of undersigned counsel on **Friday, February 25, 2011, at 10:00 am**, for the taking of your deposition in this action. You are to have with you at the above place and time the following:

DUCES TECUM:

Any and all documents reflecting or relating to services rendered:

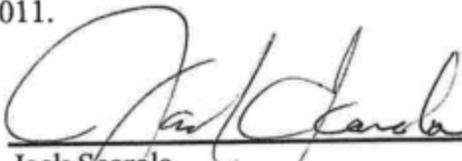
1. At or in the general vicinity of 358 El Brillo Way, Palm Beach, FL 33480-4730; and
2. For the benefit of or at the direction of Jeffrey Epstein and/or Jack Goldberger, Esquire.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Subpoena Duces Tecum for Deposition – Ingram

If you fail to appear, you may be in contempt of Court.

You are subpoenaed to appear by the following attorney and unless excused from this subpoena by this attorney or the Court, you shall respond to this subpoena as directed.

DATED this 16th day of February 2011.



Jack Scarola
On Behalf of the Court

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

