

Epstein v. Edwards

CASE STATUS AND OUTLINE OF MEETING ON JANUARY 11, 2013

Jeffrey Epstein, Fred Haddad, Jack Goldberger, and Tonja Haddad Coleman present

1. Petition for Writ is due on or before **January 17**- final draft is with DKI for review. Tonja will revise and get to Dee (Fred's Paralegal) for final filing by Monday, January 14.
2. Objections/Motion for Protective Order (if we can) re: Financial Worth Discovery due **January 22**- will file before that date- and Scarola has been so kind as to already set a hearing for January 24 in "anticipation" of our responses, at which we will seek, on the record, to stipulate to net worth and obviate the need for the discovery.
3. We agreed to file a Motion to Dismiss the Fourth Amended Counterclaim (even though it may be stricken by the Court) due to Epstein's failure to comply with the pleading requirements, and at least give Crow another chance to properly rule on the issue. This is due on or before **January 22** (technically we have 10 days from January 9 to respond, but that is a Saturday and Monday is MLK day- legal holiday)- we are hoping to file this by next **Friday, January 18** to avoid any potential Scarola objection.
4. We will draft and file a Motion to Strike Discovery Objections and Compel Responses to our discovery to Brad Edwards regarding his damages and set it for hearing as soon as possible (but obviously after the items delineated above, which have very tight deadlines).