

JEFFREY EPSTEIN,

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT IN  
AND FOR PALM BEACH COUNTY,  
FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Plaintiff,

vs.

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

Defendants.

/

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S REQUEST FOR  
PRODUCTION TO DEFENDANT/COUNTER-PLAINTIFF BRADLEY J.  
EDWARDS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby requests that Defendant/Counter-Plaintiff Bradley J. Edwards produce for inspection and copying those items requested in the attached Request for Production within 30 days of service at the offices of Tonja Haddad, PA, 315 SE 7<sup>th</sup> Street, Suite 301, Fort Lauderdale, FL 33301.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this June 25, 2013.

/s/ Tonja Haddad Coleman  
Tonja Haddad Coleman, Esq.  
Fla. Bar No.: 0176737  
TONJA HADDAD, PA  
315 SE 7<sup>th</sup> Street  
Suite 301  
Fort Lauderdale, Florida 33301

[REDACTED] (facsimile)  
[REDACTED]

### **DEFINITIONS AND INSTRUCTIONS**

1. The term "Edwards," "you" or "your" means the party or parties to whom this Request for Production is addressed, *i.e.*, Defendant/Counter-Plaintiff Bradley J. Edwards, including, all persons acting or purporting to act on his behalf.

2. "Counterclaim" means the Fourth Amended Counterclaim which you served on the Plaintiff/Counter-Defendant Jeffrey Epstein in this action.

3. The term "witness" means any natural person, individual, proprietorship, partnership, limited liability company, corporation, affiliate, subsidiary, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity.

4. The terms "identify," "describe" or "provide" when used with reference to a natural person means:

A. the full name, current telephone number(s) and current business and home addresses (or, if the current telephone number and/or current business and home addresses are not known, the last known telephone numbers and/or business and

home addresses) of the person. Addresses shall include the street and post office box if known and the city, state, country and zip code;

B. the full name and address of each employer, each corporation of which the person is an officer or director, and each limited liability company of which the person is a manager or a member, each partnership of which the person is a partner, and each other business in which the person is a principal;

C. the person's current (or, if the current is not known, the last known) position, and the position or positions held by the person at the time of the act to which the response to a specific request relates; and

D. such other information as is sufficient to provide full identification of the person.

5. The terms "identify," "describe" or "provide" when used with reference to any entity other than a natural person means:

A. the full name of the entity, the type of entity (e.g., corporation, limited liability company, partnership, etc.), the address of its principal place of business, its principal business activity, the jurisdiction under the laws of which it has been organized and the date of such organization;

B. each of the entity's officers, directors, shareholders, managers, members, partners or other principals.

C. any other available information concerning the existence or identity of the entity.

6. The terms "identify," "describe" or "provide" when used with reference to a document means:

- A. the name or designation of the document;
- B. the name of the person(s) who participated in the creation of the document;
- C. the date of the document;
- D. the person or entity to whom the document is addressed (if any) and those to whom any copies of the document were addressed or delivered;
- E. a brief description of the contents of the document; and
- F. all signatories to the document.

7. "Document" means any agreement, contract, letter, correspondence, memorandum, report, calendar, diary, appointment book, log, record (including business, financial and medical records), ledger, audit, bill, invoice, statement, schedule, recording of sound or photographs, electronic file (whether on disk, tape, drive or otherwise), printout, writing, drawing, sketch, notes (handwritten or otherwise), map, blueprint, e-mail, data compilation, and written or recorded material of any kind and character.

8. "Referring to," "reflecting," "evidencing" or "relating to" means in any way directly or indirectly, concerning, referring to, disclosing, describing, confirming, supporting, evidencing or representing.

9. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request which might otherwise be construed to be outside its scope.

10. "Person" means any individual natural person, partnership, association, firm, limited liability company, corporation, organization, trust, governmental or public

entity, and any of the officers, directors, shareholders, members, managers, partners, agents, employees, assigns or representatives of the same.

11. "Substantiate," "state" or "explain" means to produce documents or things that set forth the circumstances or bases for any belief, contention or position or give information or direction in response to a request.

12. If documents or things that are responsive to all or part of a specific request are not within your custody, possession or control, for each, state when it was last in your custody, possession or control, and why it is no longer in your custody, possession, or control and identify the person(s) that you know has or last had or that you believe has or last had custody, possession or control of such document or thing.

13. If you do not presently have in your custody, possession or control, documents or things that are responsive to a request, include a statement to that effect, and at such time as any responsive document or thing comes into your custody, possession or control, produce same within ten days of its location, and in any event, produce it no less than ten days prior to trial.

14. Except where otherwise stated, the time period for the requests made herein is January 1, 2009 through the present.

## **REQUESTS**

1. All timesheets, billing invoices, or other documents showing time spent at work or on work-related business from January 2008 to present. This shall include, but is not limited to, any and all documents that show your billable hourly rate for the year in which the billing occurred, the number of hours spent on any given day performing work; whether on a pro-bono, contingency, or hourly billing basis.

2. Copies of any and all memoranda, diaries, journals, appointment books, calendars, electronic mails, notes, correspondence, or other documents that establish any personal time, vacation time, or sick leave taken from work from November 2009 through September 2012.

3. Copies of any and all memoranda, diaries, journals, appointment books, calendars, electronic mails, notes, correspondence, or other documents that establish any time spent on professional activities including, but not limited to, professional associations, volunteer organizations, voluntary bar organizations, community organizations, and civic or political organizations from November 2009 through September 2012.

**Electronic Service List**

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