

IN THE CIRCUIT COURT OF THE 15TH  
JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,

Complex Litigation, Fla.R.Civ.Pro. 1.201

Case No. 502009CA040800XXXXMBAG

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, Individually,  
BRADLEY J. EDWARDS, Individually,

Defendants/Counter-Plaintiffs.

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**PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN'S MOTION TO  
ENLARGE TIME TO RESPOND TO EDWARDS' ADDITIONAL INTERROGATORY**

Plaintiff/Counter-Defendant, Jeffrey Epstein, ("Epstein"), by and through his undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, files this Motion to Enlarge Time to Respond to Defendant, Counter/Plaintiff, Bradley J. Edwards' Additional Interrogatory. The grounds for this motion are as follows:

1. On April 1, 2011, Defendant, Counter/Plaintiff, Bradley J. Edwards ("Edwards") served by facsimile his Notice of Propounding Interrogatory a/k/a Additional Interrogatory to Epstein. A copy of this discovery request is attached hereto as Exhibit "A".
2. The deadline for Epstein to respond to this discovery request is May 2, 2011.
3. Initially, Mr. Edwards submitted interrogatories in excess of the permissive number. The parties agreed to allow an excess number of interrogatories and the court entered an agreed order expanding the number of interrogatories on October 5, 2010.
4. The number of interrogatories for which Edwards seeks a response is approximately 68 interrogatories.

5. Edwards has pending with this discovery his Motion to Permit Additional Interrogatory which motion has not be set before this court for hearing.

6. Epstein requests an extension of fourteen (14) days within which to serve his response to Edwards' Additional Interrogatory faxed April 1, 2011.

8. Undersigned counsel certifies that this request is made in good faith and not for the purpose of delay. The undersigned counsel further certifies that he has and will continue to make an effort to resolve this matter without the need of a hearing.

WHEREFORE, the Plaintiff/Counter-Defendant, Jeffrey Epstein, respectfully requests that this Court grant an extension of fourteen (14) days; i.e. up to an including May 16, 2011 in which to serve a response to Edwards' Additional Interrogatory.

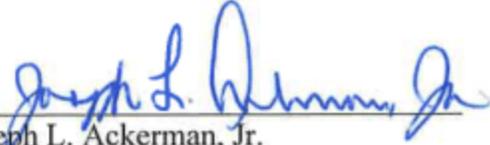
#### CERTIFICATE OF SERVICE

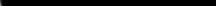
I HEREBY CERTIFY that a true and correct copy of the foregoing has been duly furnished via  Email,  Facsimile,  U.S. Mail,  Hand Delivery,  Federal Express this 24 day of May, 2011 to:

Jack Scarola, Esq.  
Searcy Denney Scarola Barnhart & Shipley, P.A  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Jack Alan Goldberger, Esq.  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401-5012

Marc S. Nurik, Esq.  
Law Offices of Marc S. Nurik  
One E. Broward Blvd., Suite 700  
Ft. Lauderdale, FL 33301

By: 

Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954  
FOWLER WHITE BURNETT P.A.  
901 Phillips Point West  
777 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone:   
Facsimile: 

Attorneys for Jeffrey Epstein, Plaintiff/  
Counter-Defendant

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,

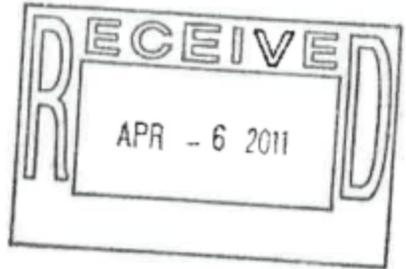
Defendant(s).

\_\_\_\_\_ /

**NOTICE OF PROPOUNDING INTERROGATORY  
TO PLAINTIFF, JEFFREY EPSTEIN**

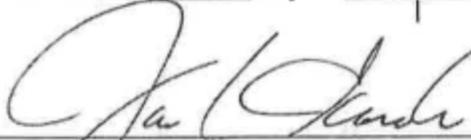
Defendant, Bradley J. Edwards, hereby provides notice that pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, that one (1) Interrogatory has been directed to Plaintiff, Jeffrey Epstein, this 1st day of April, 2011.

It is requested that the aforesaid answers be served within thirty (30) days at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409.



Case No.: 502009CA040800XXXXMBAG

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 on this *1st* day of *April*, 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 Plaintiff(s)

COUNSEL LIST

Jack A. Goldberger, Esquire

[REDACTED]

Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401

Phone: [REDACTED]

Fax: [REDACTED]

Attorneys for Jeffrey Epstein

Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, PL

425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301

Phone: [REDACTED]

Fax: [REDACTED]

Attorneys for Jeffrey Epstein

Joseph L. Ackerman, Jr., Esquire

[REDACTED]

Fowler White Burnett, P.A.  
901 Phillips Point West  
777 S Flagler Drive  
West Palm Beach, FL 33401-6170

Phone: [REDACTED]

Fax: [REDACTED]

Attorneys for Jeffrey Epstein

Marc S. Nurik

[REDACTED]

Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301

Phone: [REDACTED]

Fax: [REDACTED]

Attorneys for Scott Rothstein

**INTERROGATORY TO PLAINTIFF, JEFFREY EPSTEIN**

(If answering for another person or entity, answer with respect to  
that person or entity, unless otherwise stated.)  
\_\_\_\_\_

1. As to every act characterized by the Plaintiff as an alleged "abuse of process" by Bradley Edwards, state the following:
  - a. An exact and detailed description of the "process" including the title of all pleadings or other documents which Plaintiff contends were abusive;
  - b. The date on which each alleged abuse occurred;
  - c. The nature of the damage suffered by the Plaintiff as a consequence of this abuse;
  - d. The amount of the damage alleged to have been caused by the abuse.

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STATE OF \_\_\_\_\_)

COUNTY OF \_\_\_\_\_)

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_, by \_\_\_\_\_, who is personally known to me or who has produced \_\_\_\_\_ as identification and who did/did not take an oath.

(SEAL)

\_\_\_\_\_  
(Notary signature)

\_\_\_\_\_  
(Notary name - print)  
NOTARY PUBLIC, State of Florida

\_\_\_\_\_  
(Serial number, if any)