

# TONJA HADDAD, PA

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September 9, 2013

**Via Electronic Mail**

Jack Scarola, Esq.  
Searcy Denney *et al.*  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Re: *Epstein v. Edwards et al.*

Mr. Scarola:

I have reviewed your "Amended Exhibit List of Counter-plaintiff, Bradley Edwards," and before I draft our objections to nearly every item thereon, I wanted to bring it to your attention that this is obviously an exhibit list from another case, which does not appear to have been reviewed before it was filed in this case. Below is just a glimpse of the glaring errors which we are, in good faith, bringing to your attention in an effort to avoid delay and comply with the Court's Order regarding our Pre-Trial Stipulation.

First, the document itself is titled as an "Amended" exhibit list, notwithstanding that we never received one before. Next, virtually none of the items delineated in your exhibit list has been provided to us through discovery, or even referenced, in the instant case. In fact, many of the names referenced thereon are names that have never been raised in this case; including approximately a dozen entries regarding reports reviewed by two (2) different doctors who are not listed as witnesses in this matter. *See* Plaintiff's Nos. 132-141. Third, you make countless references to "Plaintiff's" medical records, yearbook photos, IME's, and IHOP employment records; as well as specific references to Plaintiff as "Jane Doe." *See* Plaintiff's Nos. 27-30; 110-120. Irrefutably, these people are not plaintiffs in the case at hand, and the listed items were clearly meant for another case, as they have absolutely no bearing on an abuse of process or malicious prosecution cause of action.

The above-referenced examples are by no means to be considered as an exhaustive list of the glaring deficiencies in your exhibit list. However, should you wish to stand by your current exhibit list, we will need to review and inspect all items thereon which are not in our possession so that we may properly evaluate same.

Sincerely,  
TONJA HADDAD, PA



Tonja Haddad Coleman  
for the firm

cc: Brad Edwards, Esq.  
Fred Haddad, Esq.