

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

CIVIL DIVISION  
CASE NO. 502009CA040800XXXXMBAG  
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

SCOTT ROTHSTEIN, et al.

Defendants/Counter-Plaintiffs.

\_\_\_\_\_/

**NOTICE OF PROPOUNDING PLAINTIFF'S \_\_\_ SET OF INTERROGATORIES TO  
DEFENDANT/COUNTERPLAINTIFF BRADLEY J. EDWARDS**

Plaintiff Jeffrey Epstein hereby propounds his \_\_\_ set of Interrogatories to defendant/counterplaintiff Bradley J. Edwards ("Edwards") this \_\_\_ day of November, 2011 and requests that the above be answered within 30 days of service at the offices of Fowler White Burnett PA, Phillips Point, West Tower, 777 S. Flagler Dr., Suite 901, W. Palm Beach FL 33401.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by \_\_\_\_ this \_\_\_ day of November, 2011 on: Jack Scarola, Esq., Searcy Denney Scarola et al., 2139 Palm Beach Lakes Boulevard, 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; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301.

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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: 

**DEFINITIONS AND INSTRUCTIONS**

1. The term "Edwards," "you" "or "your" means the party or parties to whom these interrogatories are addressed, i.e., defendant/counterplaintiff Bradley J. Edwards, including, all persons acting or purporting to act on his behalf.

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

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

A. the full name, telephone number(s) and business and home addresses (or, if the current address is not known, the last known address) of the person. Address 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 business in which the person is a principal;

C. the person's present (or, if the present is not known, the last known) position and the position or positions at the time of the act to which the interrogatory answer relates; and

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

4. 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, partnership, etc.), the address of its principal place of business, its principal business activity and,

if it is a corporation, 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 or other principals.
- C. any other available information concerning the existence or identity of the

entity.

5. 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 who created 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; and

- E. a brief description of the contents of the document.

6. "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.

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

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

9. "Person" means any individual natural person, partnership, association, firm, corporation, organization, trust, governmental or public entity, and any of its agents, employees, assigns or representatives.

10. "Substantiate," "state" or "explain" means to set forth the circumstances or bases for any belief, contention or position or to give information or direction in response to a question.

11. If all the information furnished in an answer to all or part of an interrogatory is not within the personal knowledge of the affiant, identify each person to whom all or part of the information furnished is a matter of personal knowledge and each person who communicated to the affiant any part of the information furnished.

12. If the answer to all or any part of the interrogatory is not presently known or available to an affiant, include a statement to that effect, furnish the information known or available, and respond to the entire interrogatory by supplemental answer, in writing, under oath, within ten days from the time the entire answer becomes known or available, and in no event, less than ten days prior to trial.

13. Whenever, in any answer to any interrogatory, a reference is made to one or more persons, specify by name, the particular person to whom reference is intended.

**INTERROGATORIES**

1. Identify each and every fact that supports the allegations set forth in your Amended Counterclaim (served October 4, 2011), including specifically

a. a detailed description of the damages you allege to have suffered; including those you claim have resulted in

(1) injury to your reputation, and

(2) interference in your professional relationships; and

b. a detailed description of the special damages you allege that you have suffered, including

(1) the loss of the value of your time diverted from your professional responsibilities, and

(2) the cost of defending claims against you in this lawsuit.

2. Explain in detail how your reputation has been injured as a direct result of this action against you from the filing of this action to the present.

3. Explain in detail how the filing of this action against you has interfered with your professional relationships and for each such relationship:

a. identify its nature and with whom you have or had the relationship, and

b. identify each person with knowledge of the interference.

4. Identify each and every witness that has knowledge of the damages you seek to recover in this action, including but not limited to your employer, your partners, your family members, associates, colleagues, referral sources, and clients and, for each, describe the nature of his or her knowledge.

5. Explain the basis for your claim that your allegation that your reputation has been injured by the allegations against you in this action.

6. Explain the method by which you have distinguished injury to your reputation resulting directly from allegations against you in this action from injury to your reputation resulting from your having been a partner in the defunct firm of Rothstein Rosenfeldt & Adler.

7. Identify all fees and costs that you have incurred for the defense of this action against you.

8. If you have a written engagement agreement with the firm of Searcy Denny Scarola Barnhart & Shipley, P. A., describe the date of the agreement, the scope of services and the terms on which your counsel are to be compensated.

9. If you do not have a written engagement agreement with the firm of Searcy Denny Scarola Barnhart & Shipley, P. A., describe the terms of your oral representation agreement, the scope of services and the terms on which your counsel are to be compensated.

10. If you (or another on your behalf) have paid any legal fees and costs incurred for the defense of this action, provide the amounts paid and the date of each payment.

11. State, by week or month, the amount of hours that you devoted to your professional work since the filing of this action against you (2009, 2010 and 2011) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

12. State, by week or month, the amount of hours that you have devoted to your professional work during the two years prior to the filing of this action against you (2007 and 2008) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

13. State the amount of gross income that you received from providing services as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011.

14. State the amount of gross income that you received from the provision of goods or services other than while acting as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011

15. State the amount of hours that you have devoted to pro bono work for the years 2007, 2008, 2009, 2010 and 2011 and substantiate your answer with the names of the cases or causes for which you provided such service.

16. If you claim to have been damaged as a result of this action against you that has caused you to seek professional medical or psychological services:

- a. identify each provider of such services;
- b. state the dates during which you received treatment or assistance for such services; and
- c. state the amount of money you have paid for such services.

17. If you claim to have suffered any loss of income, wages, or other remuneration as a result of the claims made against you in this action, describe in detail

- a. the nature of the lost income, whether by wages or other remuneration (e.g., loss of clients, loss of earnings for hours engaged in the practice of law, etc.);
- b. the amount of lost income, whether by wages or other remuneration, for each period for which you typically receive the above (e.g., if you bill or otherwise keep track of legal services you provide by the hour, the number of hours which you were unable to perform such services for each month) since the filing of this action;

c. the duration of the loss, i.e., the date the loss commenced and concluded;  
and

d. the method used in calculating your loss of income, whether by wages or other remuneration, for the period you have claim to have suffered damages.

18. If you are claiming that you have suffered loss of future earning capacity as a direct result of the allegedly wrongful conduct, describe with specificity:

- a. the duration of the lost future earning capacity,
- b. the amount of the lost future earning capacity, and
- c. the basis for your calculation.

19. If you are claiming to have lost business or employment opportunities as a direct result of the allegedly wrongful conduct of the plaintiff, describe each with specificity and, for each, state the amount of money damages you seek to recover.

20. Describe the method used in calculating your loss of future earnings.

21. With respect to each alleged lost business opportunity, please state for each the following:

a. the name and address of the employer, client, attorney or entity who offered or presented the business opportunity that you claim was lost;

b. the nature and scope of work involved in the lost business opportunity;

c. the amount of compensation or remuneration you estimated that you would earn or be paid had you undertaken the opportunity; and

d. the date you determined that you had lost the business opportunity.

By: \_\_\_\_\_  
signature of answering party

STATE OF FLORIDA                    )  
  )ss.  
COUNTY OF \_\_\_\_\_ )

The foregoing was acknowledged before me this \_\_\_ day of \_\_\_\_\_, 20\_\_ by Bradley J. Edwards, who is personally known to me or who has produced \_\_\_\_\_(type) for identification and who did/did not take an oath.

\_\_\_\_\_  
Notary Public, State of Florida  
My commission expires: \_\_\_\_\_

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