

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

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

RENEWED MOTION FOR ORDER TO TAKE SCOTT ROTHSTEIN'S DEPOSITION

Plaintiff, JEFFREY EPSTEIN, by and through undersigned counsel, hereby files his Renewed Motion for Order to take the deposition of Defendant, SCOTT ROTHSTEIN (hereinafter "ROTHSTEIN") and states as grounds the following:

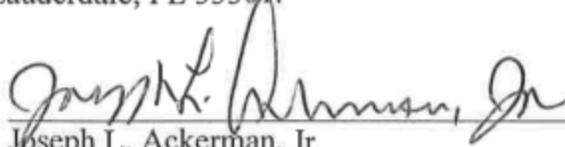
1. Plaintiff is seeking to take the deposition of SCOTT ROTHSTEIN in the above-styled litigation.
2. ROTHSTEIN is a party to this matter and therefore, Plaintiff is entitled to take his deposition in accordance with Rule 1.310 of the Florida Rules of Civil Procedures.
3. To the knowledge of the Plaintiff, ROTHSTEIN is currently incarcerated within the U.S. Department of Justice Federal Bureau of Prisons and is in protective custody.
4. The Federal Bureau of Prisons and the United States Bankruptcy Court for the Southern District of Florida require an Order entered by this Court to allow Plaintiff to take the deposition of ROTHSTEIN at the location where he is currently incarcerated.

5. Plaintiff believes that ROTHSTEIN has specific information that is crucial to the prosecution of his case.

WHEREFORE, Plaintiff respectfully requests this Court enter an Order granting Plaintiff's Renewed Motion for Order to Take Scott Rothstein's Deposition in accordance with Rule 1.310 of the Florida Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail and U.S. Mail on this 2nd day of December, 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 Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.



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