

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

vs.

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

Defendant/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT EPSTEIN'S AMENDED
RESPONSES TO INTERROGATORIES**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to this Court's order and Rule 1.350 of the *Florida Rules of Civil Procedure*, hereby files his amended¹ responses to Defendant/Counter-Plaintiff Bradley Edward's Interrogatories to Jeffrey Epstein as follows:

A. With regard to all communications that occurred at any time prior to the filing of your civil lawsuit against Bradley Edwards in which communication you expressed the position that Bradley Edwards was a knowing participant in the efforts of Scott Rothstein to defraud investors (the Scott Rothstein Ponzi scheme) or that Bradley Edwards engaged in any misconduct relating to the Scott Rothstein Ponzi scheme, state the following:

1. a detailed description of the contents of the communication;
2. all participants in and parties to the communication;

¹ As per the trial court's order and pending hearing, Epstein is not responding as to any communication that may have occurred with counsel.

3. the date, time, place and circumstances of the communication including how the communication was made;
4. whether, when, how and why the contents of the communication were ever subsequently related to any other person;
5. whether and how the contents of the communication were ever memorialized in any manner and, if so, the identity of everyone having custody of such memorialization.

ANSWER: No such non-privileged communication occurred. In other words, I never had any conversation regarding the propriety of filing suit against Rothstein and Edwards with anyone other than my counsel(s), which would require the disclosure of information that is protected by the attorney/client privilege. *United Services Auto. Ass'n. v. Roth*, 859 So. 2d 1270, 1271 (Fla. 4th DCA 2003); *Nevin v. Palm Beach County School Bd.*, 958 So. 2d 1003 (Fla. 1st DCA 2007). Accordingly, I assert the attorney/client privilege as provided for in § 90.502 of the *Florida Statutes*.

B. With regard to any request, direction, or authorization to sue Bradley Edwards communicated by you at any time prior to the filing of your civil lawsuit against Bradley Edwards, state the following:

1. a detailed description of the contents of the communication;
2. all participants in and parties to the communication;
3. the date, time, place and circumstances of the communication including how the communication was made;
4. whether, when, how and why the contents of the communication were ever subsequently related to any other person;
5. whether and how the contents of the communication were ever memorialized in any manner and, if so, the identity of everyone having custody of such memorialization.

ANSWER: No such non-privileged communication occurred. In other words, I never had a

conversation as delineated above with anyone other than my counsel(s), which would require the disclosure of information that is protected by the attorney/client privilege. *United Services Auto. Ass'n. v. Roth*, 859 So. 2d 1270, 1271 (Fla. 4th DCA 2003); *Nevin v. Palm Beach County School Bd.*, 958 So. 2d 1003 (Fla. 1st DCA 2007). Accordingly, I assert the attorney/client privilege as provided for in § 90.502 of the *Florida Statutes*.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this November 5, 2013.

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



JEFFREY EPSTEIN

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

Before me, the undersigned authority, this day personally appeared Jeffrey Epstein, who produced _____ as Identification, and who first being duly sworn, says that he has read the

foregoing, and that all of the matters are true and correct, this November ____, 2013.

NOTARY PUBLIC, STATE OF FLORIDA

Sworn and Subscribed before me this _____.

SERVICE LIST

CASE NO. 502009CA040800XXXXMBAG

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