

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 RESPONSES TO
INTERROGATORIES**

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

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;
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: Objection. The answer to this interrogatory requires the disclosure of information absolutely protected from such disclosure by the attorney/client privilege. Any communication to which the attorney-client privilege attaches is “absolutely immune from disclosure.” *United Services Auto. Ass’n. v. Roth*, 859 So. 2d 1270, 1271 (Fla. 4th DCA 2003). The attorney-client privilege is a privilege that cannot be overcome. *See 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: Objection. This interrogatory asks for the disclosure of

information absolutely protected by the attorney/client privilege. Any communication to which the attorney-client privilege attaches is “absolutely immune from disclosure.” *United Services Auto. Ass’n. v. Roth*, 859 So. 2d 1270, 1271 (Fla. 4th DCA 2003). *See 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 September 20, 2013.

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