

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

CASE NO.: 502009CA040800XXXXMBA

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

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

Defendants/Counter-Plaintiff,

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S OMNIBUS
MOTION TO STRIKE AND FOR SANCTIONS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph IV of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures and the *Florida Rules of Civil Procedure*, moves this Court to strike Defendant/Counter-Plaintiff Bradley Edwards ("Edwards") below-listed pleadings, prevent use of any of the materials or witnesses at trial, and enter an award of sanctions against him for his repetitive and flagrant disregard of the above-cited Rules and failure to comply with this Court's Order. In support thereof, Epstein states:

INTRODUCTION

This matter is set for Calendar Call before this Court on October 18, 2013. On April 2, 2013, this Court entered its Order Setting Jury Trial and Directing Pretrial and Mediation Procedures (hereinafter "Order" or "Exhibit A"), a true and correct copy of

which is attached hereto as "Exhibit A." Now, on the eve of trial, Edwards is engaging in repeated and flagrant violations of this Court's Order and the *Florida Rules of Civil Procedure*, mandating that all of the below-listed improprieties be stricken and sanctions awarded to Epstein. As demonstrated more fully below, these actions prejudice the administration of justice, thwart Epstein's ability to timely receive discovery and adequately prepare for trial, blatantly violate the Court's Order, and demonstrate Edwards's bad faith in doing so.

ITEMS TO BE STRICKEN

1. Edwards's unilateral Notice of taking Deposition of Jeffrey Epstein on October 21, 2013; *after the discovery cutoff date*. See Order, ¶II, H. This date was unilaterally set by Edwards. Edwards was repeatedly informed by counsel for Epstein that counsel was unavailable on that date and that it was outside of the discovery cutoff. However, to date he has refused to either cancel it or offer alternative dates. It is noteworthy to mention that Epstein was already deposed twice in this matter; once in 2010 and again in 2012. As such Edwards had more than liberal time within which to properly address the issue and take appropriate measures to attempt to take Epstein's deposition again, had he chosen to do so.

2. The unilateral and untimely Service of a Notice of Taking Deposition of [REDACTED] Edwards unilaterally served Epstein with a Notice of Taking Deposition on October 2, 2013 for a deposition date of October 15, 2013. A true and correct copy of the Notice is attached hereto as "Exhibit B." This "witness" is **not listed anywhere** in either party's trial or witness exhibit list and was noticed for deposition *after the discovery cutoff date*. See Order, ¶ II, H. After being notified both of the conflict with

the date upon which he set the deposition and the fact that this witness does appear anywhere in either party's witness list, Edwards still refuses to cancel the deposition. Further, no witness list was amended to include her. This Court's Order mandates that *names and addresses* of all witnesses be provided "**120 DAYS PRIOR TO CALENDAR CALL**" and that *names and addresses* of all rebuttal witnesses must be provided "**60 DAYS PRIOR TO CALENDAR CALL.**" See Order, ¶ ¶II B, C (emphasis in original). Because she is not listed on a witness list of any kind, there is irrefutably no compliance with this Court's Order.

3. The untimely filing an Expert Witness list after the deadline that contains *not one name* of an Expert. On September 27, 2013, over three (3) months after the deadline date provided in this Court's Order, Edwards filed an Amended Expert Witness list, which provides the following: "Experts include all listed attorneys involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females." A true and correct copy of this Amended Expert Witness List is attached hereto as "Exhibit C." Not only does this Court's Order say that Experts must be disclosed "**120 DAYS PRIOR TO CALENDAR CALL,**" see Order, ¶ II, A (emphasis in original); but it also requires that more detailed information be provided in the Notice, as delineated in Paragraph II, C of the Order. Such information includes, but is not limited to, the subject matter about which the witness will testify, the substance of the facts and opinions to which the expert is expected to testify, a summary of the grounds for each opinion, a copy of any written reports, and a copy of the expert's *curriculum vitae*. See Order, ¶ II, A. While a one sentence summation of these unnamed people's testimony was provided, none of the other information was provided. Furthermore, pursuant to Paragraph II, A,

Edwards is required to provide “names and addresses of all expert witnesses.” *See Order*, ¶ II, A. The flagrant disregard for Pretrial Procedure and this Court’s Order is evident, as there is not even a proper name on the list.

4. The improper service of discovery requests to which responses will be due *after the discovery cut off date*. *See Order*, ¶2, H.

As detailed below, the law mandates that these items be stricken and that sanctions be entered against Edwards for his incessant and premeditated thwarting of the judicial process, his utterly disregarding this Court’s Order, and ignoring the very rules of conduct pursuant to which attorneys are to govern themselves.

MEMORANDUM OF LAW

This Court’s Order clearly and unequivocally delineates the Pretrial rules and parameters within which the parties must adhere. *See Exhibit A*. Paragraph IV governs Noncompliance, and provides: “**NONCOMPLIANCE WITH ANY PORTION OF THIS ORDER MAY RESULT IN THE STRIKING OF THE CASE, WITNESSES, OR EXHIBITS, OR IMPOSITION OF SUCH OTHER SANCTIONS AS ARE JUST.**” (Emphasis in original). *See Exhibit A*. In the case at hand, there are multiple violations of this Court’s Order. As evidenced by the attached Exhibits, Epstein has brought these violations to Edwards’s attention in an effort to remediate the situation without Court intervention; to no avail. Edwards’s disregard of this Order, coupled with the either inapposite or non-existent responses counsel for Epstein has received in response to her attempts to resolve these issues, mandate the implementation of the remedies set forth in Paragraph IV of the Order and the *Florida Rules of Civil Procedure* governing discovery violations.

The law is clear that “[e]xcept in cases of a clear abuse of discretion prejudicial to the affected party, trial courts must be allowed to enforce pretrial orders to achieve the orderly and efficient administration of justice, fair to all parties.” *Fla. Marine Enterprises v. Bailey*, 632 So. 2d 649, 651-52 (Fla. 4th DCA 1994). Courts have held that “decisions regarding the testimony of improperly disclosed witnesses” is placed squarely “within the broad discretion of the trial judge, who is vested with the interpretation and enforcement of any pretrial order mandating witness disclosure.” *Id.* at 651. “Florida courts have explained that the rules of discovery are intended to avoid surprise and trial by ambush.” *Agrofolajes, S.A. v. E.I. Du Pont De Nemours & Co., Inc., Nos. 3D07-2322, 3D07-2318, 3D07-1036*, 2009 WL 4828975, at (Fla. 3d DCA Dec. 16, 2009); *Escutia v. Greenleaf Products, Inc.*, 886 So. 2d 1059, 1062 (Fla. 1st DCA 2004). “The privilege to practice law requires attorneys to conduct themselves in a manner compatible with the administration of justice.” *Visoly v. Security Pacific Credit Corp.*, 768 So. 2d 482, 492 (Fla. 3d DCA 2000). “While counsel does have an obligation to be faithful to their clients’ lawful objectives, that obligation cannot be used to justify unprofessional conduct by elevating the perceived duty of zealous representation over all other duties.” *Id.*

CONCLUSION

Based upon the foregoing, Epstein hereby requests that this Court impose sanctions against Edwards for all of his repeated and flagrant violations of this Court’s Order and the *Florida Rules of Civil Procedure*; to wit: Edwards must be prevented from using of any of the materials or witnesses at trial, and an award of sanctions entered against him and such other relief that this Court deems just and proper.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served,
via electronic service, to all parties on the attached service list, this October 11, 2013.

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, etc., et al.,

Defendant(s).

**ORDER SETTING JURY TRIAL AND
DIRECTING PRETRIAL AND MEDIATION PROCEDURES**

I. SCHEDULING

This action is set for jury trial on the eight week calendar beginning October 28, 2013. **YOU MUST APPEAR AT 9:00 O'CLOCK A.M. ON FRIDAY, October 18, 2013, IN COURTROOM 9C, PALM BEACH COUNTY COURTHOUSE, 205 NORTH DIXIE HIGHWAY, WEST PALM BEACH, FLORIDA FOR THE CALENDAR CALL.** (12 days reserved for the trial of this cause).

The trial will be scheduled sometime during the calendar, at a date and time to be provided at the calendar call, subject to the Court ordering a later case setting. The docket ends 12/20/13.

II. UNIFORM PRETRIAL PROCEDURE

A. On the last business day no later than 120 DAYS PRIOR TO CALENDAR CALL, the parties shall exchange lists of all trial exhibits, names and addresses of all trial witnesses, and names and addresses of all expert witnesses.

B. On the last business day no later than 60 DAYS PRIOR TO CALENDAR CALL, the parties shall exchange lists of names and addresses of all rebuttal witnesses.

C. In addition to names and addresses of each expert retained to formulate an expert opinion with regard to this cause, both on the initial listing and on rebuttal, the parties shall provide:

1. the subject matter about which the expert is expected to testify;
2. the substance of the facts and opinions to which the expert is expected to testify;
3. a summary of the grounds for each opinion;
4. a copy of any written reports issued by the expert regarding this case; and
5. a copy of the expert's curriculum vitae.

EXHIBIT A

EFTA01107661

9/18

D. On the last business day no later than 30 DAYS PRIOR TO CALENDAR CALL, the parties shall confer and:

1. discuss settlement;
2. simplify the issues and stipulate, in writing, as to as many facts and issues as possible;
3. prepare a Pre-Trial Stipulation in accordance with paragraph E; and
4. list all objections to trial exhibits.

E. **PRETRIAL STIPULATIONS MUST BE FILED.** It shall be the duty of counsel for the Plaintiff to see that the Pre-Trial Stipulation is drawn, executed by counsel for all parties, and filed with the Clerk no later than 20 DAYS PRIOR TO CALENDAR CALL. **UNILATERAL PRETRIAL STATEMENTS ARE DISALLOWED, UNLESS APPROVED BY THE COURT, AFTER NOTICE AND HEARING SHOWING GOOD CAUSE.** Counsel for all parties are charged with good faith cooperation in this regard. The Pre-Trial Stipulation shall contain in separately numbered paragraphs:

1. a list of all pending motions including MOTIONS IN LIMINE and FRYE MOTIONS requiring action by the Court and the dates those motions are set for hearing (MOTIONS IN LIMINE and FRYE HEARINGS shall not be heard the day of trial or thereafter.)
2. stipulated facts which require no proof at trial which may be read to the trier of fact;
3. a statement of all issues of fact for determination at trial;
4. each party's numbered list of trial exhibits with specific objections, if any, to schedules attached to the Stipulation;
5. each party's numbered list of trial witnesses with addresses (including all known rebuttal witnesses); the list of witnesses shall be on separate schedules attached to the Stipulation;
6. a statement of estimated trial time;
7. names of attorneys to try case; and
8. number of peremptory challenges per party.

F. **FILING OF PRE-TRIAL STIPULATION.** Failure to file the Pre-Trial Stipulation or a Court Approved Unilateral Stipulation as above provided may result in the case being stricken from the Court's calendar at its sounding or other sanctions.

G. **ADDITIONAL EXHIBITS, WITNESSES OR OBJECTIONS.** At trial, the parties shall be strictly limited to exhibits and witnesses disclosed and objections reserved on the schedules attached to the Pre-Trial Stipulation prepared in accordance with paragraphs D and E, absent agreement specifically stated in the Pre-Trial Stipulation or order of the Court upon good cause shown. Failure to reserve objections constitutes a waiver. A party desiring to use an exhibit or witness discovered after counsel have conferred pursuant to paragraph D shall immediately furnish the Court and other counsel with a description of the exhibit or with the witness' name and address and the expected subject matter of the witness' testimony, together with the reason for the late

discovery of the exhibit or witness. Use of the exhibit or witness may be allowed by the Court for good cause shown or to prevent manifest injustice.

H. **DISCOVERY.** Unless otherwise agreed in the Pre-Trial Stipulation, all discovery must be completed no later than **10 DAYS BEFORE THE DATE SET FOR CALENDAR CALL**, absent agreement for later discovery specifically stated in the Pre-Trial Stipulation or for other good cause shown.

I. **PRE-TRIAL CONFERENCE.** No pre-trial conference pursuant to Fla. R. Civ. P. 1.200 is set by the Court on its own motion. If a pre-trial conference is set upon motion of a party, counsel shall meet and prepare a stipulation pursuant to paragraphs D and E and file the stipulation no later than **5 DAYS BEFORE THE CONFERENCE**. Failure to request a pre-trial conference in a timely fashion constitutes a waiver of the notice of requirement of Rule 1.200. Motions for Summary Judgment will not be heard at any pre-trial conference.

J. **UNIQUE QUESTIONS OF LAW.** Prior to calendar call, counsel for the parties are directed to exchange and simultaneously submit to the Court appropriate memoranda with citations to legal authority in support of any unique legal questions which may reasonably be anticipated to arise during the trial.

K. **MODIFICATION TO UNIFORM PRE-TRIAL PROCEDURE.** Upon written stipulation of the parties filed with the court, the Pre-Trial Procedure, except for items II D-F, inclusive, may be modified in accordance with the parties' stipulation, except to the extent that the stipulation may interfere with the Court's scheduling of the matter for trial or hinder the orderly progress of the trial.

L. **PREMARKING EXHIBITS.** Prior to trial, each party shall meet with and assist the clerk in marking for identification all exhibits, as directed by the clerk.

M. **DEPOSITION DESIGNATIONS.** No later than **20 DAYS PRIOR TO CALENDAR CALL**, each party shall serve his, her, or its designation of depositions, or portions of depositions, each intends to offer as testimony in his, her or its case in chief. No later than **10 DAYS PRIOR TO CALENDAR CALL**, each opposing party shall serve his, her, or its counter (or "fairness") designations to portions of depositions designated, together with objections to the depositions, or portions thereof, originally designated. No later than calendar call, each party shall serve his, her or its objections to counter designations served by an opposing party.

III. MEDIATION

A. All parties are required to participate in mediation.

1. The appearance of counsel who will try the case and representatives of each party with full authority to enter into a complete compromise and settlement is mandatory. If insurance is involved, an adjuster with authority up to the policy limits or the most recent demand, whichever is lower, shall attend.

2. At least **ONE WEEK BEFORE THE CONFERENCE**, all parties shall file with the mediator a brief, written summary of the case containing a list of issues as to each party. If an attorney or party filing the summary wishes its content to remain confidential, he/she must advise the mediator in writing when the report is filed.

3. All discussions, representations, and statements made at the mediation conference shall be privileged consistent with Florida Statutes sections 44.102 and 90.408.

4. The mediator has no power to compel or enforce a settlement agreement. If a settlement is reached, it shall be the responsibility of the attorneys or parties to reduce the agreement to writing and to comply with Florida Rule of Civil Procedure 1.730(b), unless waived.

B. The Plaintiff's attorney shall be responsible for scheduling mediation. The parties should agree on a mediator. If they are unable to agree, any party may apply to the Court for appointment of a mediator in conformity with Rule 1.720 (f), Fla. R. Civ. P. The lead attorney or party shall file and serve on all parties and the mediator a Notice of Mediation giving the time, place, and date of the mediation and the mediator's name. The mediator shall be paid \$175.00 per hour, unless otherwise agreed by the parties.

C. Completion of mediation prior to calendar call is a prerequisite to trial. If mediation is not conducted, or if a party fails to participate in mediation, the case, at the Court's discretion, may be stricken from the trial calendar, pleadings may be stricken, and other sanctions may be imposed.

D. Any party opposing mediation may proceed under Florida Rule of Civil Procedure 1,700(b).

IV. NONCOMPLIANCE

NONCOMPLIANCE WITH ANY PORTION OF THIS ORDER MAY RESULT IN THE STRIKING OF THE CASE, WITNESSES, OR EXHIBITS, OR IMPOSITION OF SUCH OTHER SANCTIONS AS ARE JUST.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this _____ day of April, 2013.

DAVID F. CROW
Circuit Court Judge

Copies furnished:
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FILED
APR 02 2013
DAVID F. CROW

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

NOTICE OF TAKING DEPOSITION

TO: All counsel on the attached Counsel List

PLEASE TAKE NOTICE that the undersigned attorneys will take deposition(s) of:

NAME AND ADDRESS

DATE AND TIME

LOCATION

[REDACTED]

October 15, 2013
9:30 a.m.

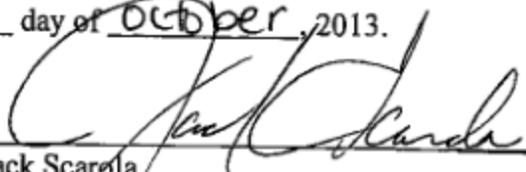
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upon oral examination before Phipps Reporting, a Notary Public; or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

EXHIBIT B

EFTA01107665

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 2nd day of October, 2013.



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cc: Phipps Reporting

E-TRANSCRIPT, ASCII, CD AND/OR DVD REQUESTED

“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Germain English, Americans with Disabilities Act Coordinator, Germain English, at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con Germain English, Americans with Disabilities Act Coordinator, Germain English, por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte Germain English, Americans with Disabilities Act Coordinator, Germain English, nan 7 jou anvan dat ou gen randevou pou parèt nan tribinal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribinal la mwens ke 7 jou; si ou gen pwoblèm pou w tande oubyen pale, rele 711.”

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IN THE CIRCUIT COURT OF THE
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

AMENDED EXPERT WITNESS LIST OF BRADLEY J. EDWARDS

Bradley J. Edwards, by and through his undersigned attorneys, hereby amends his expert witness list for trial as follows:

Experts include all listed attorneys involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females.

They will testify based upon their background, training, and experience as civil litigators, and the personal involvement that each had in prosecuting claims against Jeffrey Epstein, about the legal and ethical propriety of the actions taken by Bradley Edwards in fulfilling his obligations to the victims of Epstein's criminal assaults.

All expert witnesses timely listed by Jeffrey Epstein, subject to Edwards' objections.

Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.

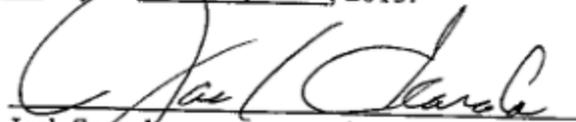
EXHIBIT C

EFTA01107669

Edwards adv. Epstein
Amended Expert Witness List
Case No.: 502009CA040800XXXXMBAG

Bradley J. Edwards reserves the right to amend this list prior to trial upon proper notice to counsel for Jeffrey Epstein.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 27th day of Sept, 2013.



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Edwards adv. Epstein
Amended Expert Witness List
Case No.: 502009CA040800XXXXMBAG

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