

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,
Defendant(s).

NOTICE OF SERVING INTERROGATORY TO JEFFREY EPSTEIN

Bradley J. Edwards, hereby gives notice pursuant to Rule 1.340(e), Florida Rules of Civil Procedure, that an Interrogatory has been directed to Jeffrey Epstein, this 15th day of JANUARY, 2014.

It is requested that the aforesaid answers be served within thirty (30) days at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409.

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 15th day of JANUARY, 2014.

B

JACK SCAROLA

Florida Bar No.: 169440

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Notice of Serving Interrogatory to Jeffrey Epstein
Case No.: 502009CA040800XXXXMBAG

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Attorneys for Jeffrey Epstein

INTERROGATORY TO JEFFREY EPSTEIN

1. Please describe separately and in detail the specific facts intended to be elicited through the testimony of each of the individuals listed as "Trial Witnesses" on the attached list.

STATE OF _____)

COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of _____, 20__, by _____, who is personally known to me or who has produced _____ as identification and who did/did not take an oath.

(SEAL)

(Notary signature)

(Notary name - print)
NOTARY PUBLIC, State of Florida

JEFFREY EPSTEIN,
Plaintiff,

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

vs.

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Defendants.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S LIST OF TRIAL
EXHIBITS, TRIAL WITNESSES AND EXPERT WITNESSES**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his list of trial exhibits, trial witnesses, and expert witnesses pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures dated November 15, 2013 as follows:

TRIAL EXHIBITS

1. Information Charging Scott W. Rothstein in *United States of America v. Stott W. Rothstein*, 09-60331-CR-COHN; dated December 1, 2009.
2. Plea Agreement between *United States of America and Scott W. Rothstein*, 09-60331-CR-COHN; filed December 1, 2009.
3. Amended Complaint in *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943 (19).
4. All Depositions taken of Scott W. Rothstein in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR and any and all ancillary cases related thereto, including, but not limited to, *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, Case No. 09-062943(19).
5. The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012.
6. Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in *In re: Rothstein Rosenfeldt Adler, P.A.*; 09-34791-RBR.

7. Docket from *Doe v. United States*, 08-80736-CIV-MARRA.
8. Any and all exhibits listed and/or used by Bradley J. Edwards.
9. All Depositions taken of Bradley J. Edwards in the case and chief and the Counterclaim in this matter, via videotape or transcription, including all exhibits used/referenced therein.
10. All documents and exhibits provided by Bradley J. Edwards to date in this matter.
11. Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by Bradley J. Edwards, including all exhibits marked at said depositions.
12. All of Edwards's Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions.
13. Complaints and Docket from *L.M. v. Jeffrey Epstein*; 09-CV-81092-COHN; and 502008 CA 018051 XXXXMB.
14. Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein.
15. Subpoena to Leonard Baird.
16. Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.
17. Any and all exhibits/documents/pleadings referenced in Epstein's Motion for Summary Judgment as to Edwards's Counterclaim.
18. Deposition of Jack (John) Scarola dated July 2, 2013 taken in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR.
19. RRA Firm Directory dated October 23, 2009.

The Defendants reserve the right to produce any newly discovered evidence upon proper notice.

The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal.

The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice.

All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection at the offices of the undersigned at a mutually convenient time and date.

TRIAL WITNESSES

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75. Any and all witnesses listed by Bradley J. Edwards.

76. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards.

Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice.

Epstein reserves the right to call and/or produce any and all witnesses necessary for impeachment or rebuttal.

Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the Parties and this Court.

EXPERT WITNESSES

Unknown at this time, but Epstein will amend upon proper review of all documents and discovery in this matter and will properly provide the name and address of same as per the Trial Court's Order.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this January 6, 2014.

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