

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.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S NOTICE OF  
OBJECTION PURSUANT TO RULE 1.351 OF THE FLORIDA RULES OF CIVIL  
PROCEDURE**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.351 of the *Florida Rules of Civil Procedure*, hereby files this Objection to Defendant/Counter-Plaintiff Bradley Edwards's ("Edwards") "Subpoena Without Deposition" which Epstein assumes<sup>1</sup> Edwards intends to serve upon the following non-party individuals on or about September 21, 2013: Darren Indyke, Esq., Roy Black, Esq., Christopher Knight, Esq., Robert Critton, Esq., Joseph L. Ackerman, Jr., Esq., Alan Dershowitz, Esq., and Jack Goldberger, Esq.

Said objection is self-executing, and there is no need for Epstein to specify his objections at this time. *See Russell v. Stardust Cruisers, Inc.*, 690 So .2d 743 (Fla. 5th DCA 1997); *Russell v. Stardust Cruisers, Inc.*, 690 So. 2d 743, 744 (Fla. 5th DCA 1997). "[W]hen any objection is

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<sup>1</sup> Edwards failed to file a proper Notice of Production from Non-Party as required by Rule 1.351 of the *Florida Rules of Civil Procedure*. *See also* Form 1.921 of the *Florida Rules of Civil Procedure*.

filed, Rule 1.351 ceases to be available.” *ABC Liquors, Inc. v. Berkey*, 589 So. 2d 457, 458 (Fla. 5th DCA 1991); *see also* Rule 1.351(c) (“If the person upon whom the subpoena is served objects at any time before the production of the documents or things, the documents or things shall not be produced under this rule, and relief may be obtained pursuant to [the rule governing depositions].”). *Morgan, Colling & Gilbert, P.A. v. Pope*, 756 So. 2d 201, 201 (Fla. 2d DCA 2000).

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 September 19, 2013.

/s/ Tonja Haddad Coleman  
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