

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

**BRADLEY J. EDWARDS' NOTICE OF FILING OBJECTIONS TO EPSTEIN'S
REVISED DESIGNATIONS FOR USE AT TRIAL OF THE DEPOSITION OF
BRADLEY J. EDWARDS TAKEN 3/23/10**

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, re-asserts all objections on the record and objects to all colloquy between counsel, and hereby submits his Objections to Plaintiff/Counterdefendant, Jeffrey Epstein's Revised Designations to the deposition of Bradley J. Edwards taken on March 23, 2010 as follows:

OBJECTIONS¹

1. 6:11-6:21 (CY)
2. 7:6-12:6 (R&M)

¹ Code to Objections:

CY= Colloquy
R&M= Relevance & Materiality
SPEC= Speculation
P= Privilege
H= Hearsay
NP= No proper predicate
R= Repetitious

3. 12:24-13:12 (R&M)
4. 13:23-14:7 (R&M)
5. 15:12-28:25 (R&M)
6. 29:24-30:5 (SPEC)
7. 31:9-59:20 (R&M)
8. 60:24-64:15 (R&M)
9. 83:23-86:23 (R&M)
10. 88:23-89:22 (P)
11. 91:20-106:16 (R&M)
12. 109:15-109:21 (R&M)
13. 114:11-115:5 (CY)
14. 116:21-117:2 (P)
15. 117:3-120:11 (R&M)
16. 120:17-120:22 (R&M)
17. 126:13-127:9 (P)
18. 142:18-142:25 (P)
19. 152:2-152:7 (P)
20. 154:9-155:6 (H)
21. 155:19-155:25 (P)
22. 156:1-168:15 (R&M)
23. 170:15-171:9 (P)

24. 171:15-173:7 (SPEC)
25. 173:8-174:6 (R&M)
26. 174:7-178:24 (R&M, SPEC)
27. 178:25-183:15 (R&M)
28. 184:4-189:14 (R&M, H)
29. 189:15-192:21 (R&M)
30. 195:20-196:17 (R&M)
31. 196:18-217:12 (R&M)
32. 221:1-221:6 (P)
33. 223:3-226:2 (P)
34. 226:12-226:19 (P)
35. 226:20-227:25 (R&M)
36. 234:16-234:23 (P)
37. 235:16-235:21 (P)
38. 236:8-236:15 (P)
39. 236:25-238:4 (R&M)
40. 238:16-245:14 (R&M)
41. 245:23-246:11 (CY)
42. 247:12-247:17 (CY)
43. 249:8-249:9 (CY)
44. 256:13-257:10 (R&M)

45. 257:20-258:13 (R&M)
46. 259:12-260:25 (R&M)
47. 261:8-262:7 (CY)
48. 262:8-263:6 (R&M)
49. 265:11-273:12 (R&M)
50. 276:21-278:14 (R&M)
51. 283:10-283:20 (CY)
52. 283:21-284:9 (CY, P)
53. 284:18-287:7 (CY, P)
54. 287:8-290:5 (CY, P)
55. 298:17-298:25 (CY, P)
56. 299:1-299:6 (NP)
57. 299:8-300:14 (R&M, H)
58. 301:16-301:21 (R&M)
59. 302:20-303:9 (NP)
60. 304:5-305:24 (R&M)
61. 306:17-308:25 (CY, P)

Edwards adv. Epstein

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Edwards' Notice of Filing Objections to Epstein's Designations of Deposition of Edwards taken 3/23/10

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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 8th day of October, 2013.



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