

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION  
CASE NO. 502009CA040800XXXXMB-AG  
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S PROPOSAL**  
**FOR SETTLEMENT TO DEFENDANT/COUNTER-PLAINTIFF**  
**BRADLEY J. EDWARDS, INDIVIDUALLY**

Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, by and through undersigned counsel, hereby serves this Proposal for Settlement upon Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, individually, pursuant to §768.79, Fla. Stat. and Fla. R. Civ. P. 1.442:

1. This Proposal is being made pursuant to §768.79, Fla. Stat. and Fla. R. Civ. P. 1.442.
2. This Proposal is being made on behalf of Plaintiff/Counter-Defendant, JEFFREY EPSTEIN.
3. This Proposal is being made to Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, individually.
4. This Proposal is directed to, and is intended to resolve, all claims pled or which could have been pled in the instant action (Case No. 502009CA040800XXXXMB-AG) by Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, individually, against Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, including any and all claims for compensatory damages, interest, and costs. This Proposal is not directed to, and is not intended to resolve, any claims

pled or which could have been pled by Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, against Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS.

5. Defendant/Counter-Plaintiff, BRADLEY EDWARDS, has not asserted a claim for punitive damages against Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, nor are attorney's fees part of the legal claim brought by Defendant/Counter-Plaintiff, BRADLEY EDWARDS, against Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, although this Proposal is intended to resolve all such claims if available.

6. The total amount of this Proposal is Three Hundred Thousand Dollars and 00/100 (\$300,000.00).

7. The conditions of this Proposal are: (1) that Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, individually, shall execute and deliver to undersigned counsel the General Release attached hereto as Exhibit "A;" and (2) that Defendant/Counter-Plaintiff BRADLEY J. EDWARDS, individually, shall, by and through his attorney, execute and deliver to undersigned counsel the Stipulation for Dismissal with Prejudice attached hereto as Exhibit "B."

8. This Proposal shall expire in thirty (30) days from its service unless withdrawn in writing prior to that date. Any acceptance of this Proposal must be in writing and must be an acceptance of the entire Proposal as outlined above.

I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed and mailed this \_\_\_\_ day of August, 2011 to Jack Scarola, Esq., Searcy, Denney, Scarola, Barnhart & Shipley, P.A., [REDACTED].

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Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954

FOWLER WHITE BURNETT, P.A.  
Espirito Santo Plaza, Fourteenth Floor



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