

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

Case No. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants,

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**JOINT PRETRIAL STIPULATION**

Pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") and Defendant/Counter-Plaintiff Bradley Edwards ("Edwards") hereby submit this Joint Pretrial Stipulation.

**1. List of All Pending Motions:**

- a. Edwards' Motion to Determine Entitlement to Adverse Inference and Precluding Epstein from Offering Evidence at Trial;
- b. Epstein's Motion to Quash Edwards's Subpoenas *Duces Tecum* and for Sanctions;
- c. Epstein's Motion for Summary Judgment.
- d. Epstein's Motion in Limine.
- e. Edwards' Motion to Compel Answers to Interrogatories

2. **Stipulated Facts:** None.

3. **Statement of Issues of Fact for Determination at Trial:**

a. Plaintiff contends that the following are issues of fact for determination at trial:

1. Whether Epstein had probable cause to bring suit against Edwards for the claims brought by him;

2. Did Epstein maliciously and improperly set in motion a chain of events that lead to the initiation of a judicial proceeding against Edwards?

3. Whether Epstein sued Edwards maliciously;

4. Whether Epstein continued the prosecution of the claims against Edwards out of malice and for the ulterior motive of attempting to extort Edwards;

5. Whether Epstein engaged in an illegal, improper, or perverted use of the judicial process by his actions in the case he pursued against Edwards;

6. Whether and to what extent Edwards has been damaged in the past and will continue to be damaged in the future;

7. Whether and in what amount it is appropriate to impose punitive damages against Epstein

b. Defendant contends that the following are issues of fact for determination at trial:

1. Epstein agrees that Edwards must prove each and every one of the issues listed above.

2. Whether Edwards has overcome the litigation privilege.
3. Each and every allegation in Edwards's Complaint.

**4. Exhibit Lists (with Objections):**

Plaintiff's Exhibit List is attached as Exhibit A

Defendant's Exhibit List is attached as Exhibit B

**5. Witness Lists:**

Plaintiff's Witness List is attached as Exhibit A

Defendant's Witness List is attached as Exhibit B

6. **Estimated Trial Time:** 10 trial days

**7. Names, Addresses, and Telephone Numbers of Attorneys to Try the Case:**

For Plaintiff:

Jack Scarola, Esquire  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, FL33409



For Defendant:

Fred Haddad, Esq.

[REDACTED]  
1 Financial Plaza  
Suite 2612  
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[REDACTED]

Jack Goldberger, Esq.

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Suite 1400  
West Palm Beach, FL 33401

Tonja Haddad Coleman, Esquire

[REDACTED]; [REDACTED]  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
[REDACTED]

**8. Number of Peremptory Challenges Per Party: 3**

**9. Short, Plain Statement of the Case Which Will Be Read to the Jury:**

Edwards' Proposed Statement:

Jeffrey Epstein was criminally accused of engaging in illicit sexual activity with multiple under-aged females. More than 20 persons alleging to be victims of Epstein's crimes brought civil suits against Epstein. Several of those persons were represented by Attorney Bradley Edwards. While the claims on behalf of those persons were being prosecuted by Edwards, it was publicly disclosed that the senior partner in the law firm that employed Edwards, Scott Rothstein, had conducted a fraudulent scheme which, in part, had used the claims against Epstein to induce investors to buy interests in non-existent settlements. Rothstein's scheme raised hundreds of millions of dollars and was one of the largest frauds in U.S. history.

After the Rothstein scheme unraveled and the fraud was publicly disclosed, Epstein went to his attorneys and arranged for a lawsuit to be filed against Edwards. Epstein's attorneys then filed suit against Edwards alleging that he was a knowing participant in Rothstein's fraud. Epstein later settled the claims being prosecuted by Edwards on his client's behalf, but Edwards continued to pursue an action challenging the plea deal Epstein struck with the Federal government.

Bradley Edwards defended against Epstein's lawsuit, challenging it on the grounds that it had no legal or factual support. Shortly before the Court was scheduled to rule on Mr. Edwards' challenge, Epstein dropped all of his claims against Edwards. Bradley Edwards has now sued

Jeffrey Epstein alleging that the sole reason for Epstein's lawsuit was an attempt to intimidate Edwards into abandoning or compromising his clients' interests.

Epstein's Proposed Statement:

Epstein contends no statement is required or necessary.

**10. Detailed List of All Agreements and Stipulations that May Affect the Trial:**

None

**11. Certification of Counsel:**

Each of the attorneys who will try the case have read the Order Setting Trial and and have fully complied with the Order or will comply by the first day of trial.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2013.

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Tonja Haddad Coleman, Esquire

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Attorneys for Jeffrey Epstein



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Attorneys for Bradley J. Edwards