

July 12, 2012

Via US and Electronic Mail

Jack Scarola, Esq.
Searcy Denney *et al.*
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

Re: *Epstein v. Edwards et al.*

Dear Mr. Scarola:

After a careful review of Scott Rothstein's Deposition testimony, the pleadings in this matter, the limited discovery we have received from you, and the current outstanding discovery requests (some of which the Court has yet to rule upon), please be advised of the following:

First, while we understand your position with respect to Mr. Rothstein's testimony as it relates to Brad Edwards, we disagree that it somehow disposes of Mr. Epstein's claims against Mr. Edwards. Mr. Epstein's litigation does not solely rely on Mr. Edwards being involved in Mr. Rothstein's Ponzi scheme, and while Mr. Rothstein may have testified that he did not order or instruct Mr. Edwards to do certain things to further his Ponzi scheme, the fact remains that Mr. Edwards did engage in behaviors consistent with Mr. Epstein's claims. For instance, Mr. Edwards deposed prominent celebrities without asking questions relevant to his cause of action; threatened in the press to depose other prominent and influential people who had absolutely nothing to do with his clients' underlying case; and continually makes allegations of illegal sexual acts occurring on Mr. Epstein's airplane when Mr. Edwards's own clients have never made *any allegations whatsoever* that they were ever on Mr. Epstein's airplane. These are just a few of the facts that support the pending claims against Mr. Edwards.

Second, while Rothstein's testimony may provide one version of the underlying events at issue, corroborating evidence—or the lack thereof—will aid in determining whether that testimony is credible. But because you have refused, for over two years, to provide virtually any of the discovery we have requested, we have been and are still unable to further investigate and potentially re-evaluate our claims. Accordingly, we are again, in a good faith effort to further investigate and potentially resolve this matter, requesting copies of the electronic communications that have yet to be turned over. Specifically, and without waiving any claim or right to any and all of the electronic communications already requested from you, a review of the following would be germane to furthering our investigation and making a determination: communications between or including (either with a carbon copy, blind copy, or forwarded copy) Brad Edwards and the following parties: Marc Nurik; Ken Jenne; Russell Adler; William Berger; Cara Holmes;

Mike Fisten; “all staff” and/or “all attorneys” at RRA; any and all investigators; any members of the press; and any and all communications to any party as related to the “Epstein meeting” that took place on or about July 23, 2009. Given your firm belief in the truth of Mr. Rothstein’s testimony, I anticipate that you will be amenable to finally fulfilling this long-outstanding request. Please advise whether you intend to comply with your discovery obligations in this regard and facilitate the potential resolution of these matters.

Finally, upon our review of the afore-referenced communications, we will determine whether it is necessary to schedule the continuation of Mr. Edwards’ deposition. Please advise. Thank you.

Sincerely,
TONJA HADDAD, PA

Tonja Haddad Coleman
for the firm