

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA
CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,
Plaintiff,
vs.
SCOTT ROTHSTEIN, individually,
and BRADLEY J. EDWARDS,
individually,
Defendants.

VIDEOTAPE DEPOSITION OF BRADLEY EDWARDS

May 15th, 2013
10:00 A.M. - 12:20 P.M.

401 East Las Olas Blvd., Suite 1400
Fort Lauderdale, FL

Stenographically Reported By:
WENDY ROBERTS, RPR
Notary Public, State of Florida
Empire Legal Support, Inc.
Fort Lauderdale Office
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 ALSO PRESENT: JEFF EPSTEIN, PLAINTIFF
 DEBRA FEIN, LAW CLERK

1 Videotape Deposition taken before Wendy Roberts,
 2 Registered Professional Reporter and Notary Public in
 3 and for the State of Florida at Large, in the above
 4 cause.
 5
 6 ---
 7 THE VIDEOGRAPHER: We are now on the video
 8 record. Today's date is May 15th, 2013. The time
 9 is 10:17 [REDACTED]. This is the video deposition of
 10 Bradley Edwards taken in the matter of Jeffrey
 11 Epstein v. Scott Rothstein, Case
 12 No. 502009CA040800XXXXMBAG.
 13 We're located at 401 East Las Olas Boulevard,
 14 Fort Lauderdale, Florida. The court reporter is
 15 Wendy Roberts, the videographer is Anthony Estevez,
 16 both with Empire Legal.
 17 Would counsel please state their appearances
 18 for the record.
 19 MR. KING: William King, Searcy Denney Scarola
 20 Barnhart & Shipley for Mr. Edwards.
 21 MR. HADDAD: Fred Haddad on behalf of Jeff
 22 Epstein.
 23 MR. GOLDBERGER: Jack Goldberger, Atterbury,
 24 Goldberger & Weiss on behalf of Jeffrey Epstein.
 25 MS. HADDAD COLEMAN: Tonja Haddad Coleman on
 behalf of Jeffrey Epstein.

1 THE COURT REPORTER: Would you raise your hand
 2 to be sworn in, please. Do you solemnly swear the
 3 testimony you are about to give in this case will
 4 be the truth, the whole truth and nothing but the
 5 truth, so help you God?
 6 THE WITNESS: Yes.
 7 Thereupon:
 8 BRADLEY EDWARDS
 9 having been first duly sworn or affirmed, was
 10 examined and testified as follows:
 11 DIRECT EXAMINATION
 12 BY MR. HADDAD:
 13 Q State your name, please.
 14 A Brad Edwards.
 15 Q All right. And is that your practicing name
 16 or your legal name?
 17 A My practicing name.
 18 Q All right. You're Bradley Edward, what's your
 19 middle name?
 20 A Bradley James Edwards.
 21 Q Okay. You're how old?
 22 A [REDACTED]
 23 Q Okay. You were admitted to practice when?
 24 A 2002.
 25 Q All right. So that's 13 years you have been

1 practicing -- no, 11 years?
 2 A Yes.
 3 Q All right. And my recollection is you gave a
 4 deposition in 2010, correct?
 5 A Correct.
 6 Q A couple hundred pages of depositions?
 7 A Correct.
 8 Q All right. And I am not here to reinvent the
 9 wheel or reinvent the deposition. I know what you said
 10 then. We've had three years elapse since that time so I
 11 just want to catch up a little bit to start with. You
 12 spent some time in the State Attorney's Office, correct?
 13 A Correct.
 14 Q How many years?
 15 A Roughly three.
 16 Q All right. And when you left the State
 17 Attorney's Office, were you a division prosecutor,
 18 special units prosecutor?
 19 A Division prosecutor.
 20 Q Which division were you in when you left, if
 21 you recall?
 22 A Judge Gates.
 23 Q Okay. And were you the lead?
 24 A Yes.
 25 Q And how long had you had the lead in that

1 division?
 2 A Not long. I don't remember.
 3 Q You left to go with which firm?
 4 A Kubicki Draper.
 5 Q Where are they located?
 6 A Fort Lauderdale.
 7 Q What kind of work did you do?
 8 A Insurance defense.
 9 Q And how long did you stay with them?
 10 A A couple years.
 11 Q All right. Then you went out on your own?
 12 A Correct.
 13 Q And then you started a plaintiffs' firm,
 14 correct?
 15 A Yes.
 16 Q And I know the whole story, when you met
 17 Russell Adler, et cetera, at the gym and all of that so
 18 we don't need to go through that again, you ended up
 19 with RRA for a period of time, correct?
 20 A True.
 21 Q All right. And of course this is old home
 22 week here in this building, as a matter of fact, I
 23 forgot, correct?
 24 A The same building.
 25 Q Same building. All right. And then one day

1 in October of -- was it 2009?
 2 A Yes.
 3 Q Halloween weekend, correct?
 4 A Yes.
 5 Q All right. You were advised that the firm had
 6 no longer the ability to function.
 7 A Correct.
 8 Q Yourself, I know Gary Farmer was with you at
 9 RRA, was Matt Weissing there too?
 10 A Yes.
 11 Q And who else, Scott Lehrman, is that his name?
 12 No, not that one. Who else was there with you? Let me
 13 do it that way, it's easier.
 14 A I think there were 60 lawyers there with me.
 15 Q No, no, I am talking about in your unit of
 16 torts lawyers, that you can recall?
 17 A In my unit it was Russ Adler --
 18 Q Right.
 19 A -- myself, Scott Goldstein.
 20 Q That's it. Okay.
 21 A Seth Lehrman, Tami Wolfe. I think there were
 22 others, I can't really remember.
 23 Q All right. Farmer was not part of the firm at
 24 the time?
 25 A He was part of the firm but he wasn't a

1 personal injury tort lawyer. He did mainly qui tam and
 2 class action, which was a separate division of RRA.
 3 Q All right. Now, you left that firm obviously
 4 for the obvious reason, there was no firm, and you guys
 5 started your own firm; would that be fair?
 6 A I started my own firm with some of the other
 7 people that were previously at RRA, correct.
 8 Q All right. And my recollection is you are an
 9 association of P.A.s, correct?
 10 A Yes.
 11 Q P.A., that's another association of P.A., am I
 12 correct?
 13 A The current firm that I'm at?
 14 Q Yeah, yeah.
 15 A Yeah.
 16 Q You are Bradley Edwards, P.A., as part of the
 17 rest of the firm P.A., correct?
 18 A You have the right idea.
 19 Q Huh?
 20 A You have the right idea.
 21 Q Thank you.
 22 MR. GOLDBERGER: He's an LLC.
 23 MR. HADDAD: Huh?
 24 MR. GOLDBERGER: He's an LLC, that's what he's
 25 trying to tell you.

1 A Yeah, but you are on the right track, I got
 2 you, we understand each other.
 3 MR. HADDAD: We are the same, Jack. You know,
 4 us poor sole practitioners don't get along with
 5 that sort of thing, you know. We are from the old
 6 school, we don't need to keep books.
 7 BY MR. HADDAD:
 8 Q So at any rate, you became with that firm,
 9 correct?
 10 A Yes.
 11 Q All right. Now, you brought with you, and I'm
 12 not going through all of this other stuff, the Epstein
 13 cases, correct? When you went to RRA, that was part of
 14 the reason Russell was asking you to come in?
 15 MR. KING: I'm going to object because this is
 16 repetitious.
 17 MR. HADDAD: I understand that.
 18 MR. KING: It was all done in his first depo.
 19 I'm giving you a little leeway here so --
 20 MR. HADDAD: Yeah, I understand. I'm just
 21 trying to lead into this. I am not trying to go
 22 into that all over again.
 23 BY MR. HADDAD:
 24 Q It's just from more of a pointing chip for the
 25 deposition, correct?

1 A You are asking me a bunch of questions.
 2 Q Nevermind, let me just --
 3 A But I think we all know --
 4 Q Yeah, let me just go from there. All right.
 5 Let's start -- let's go backwards from 20 -- let's start
 6 backwards. It's now 2013, correct?
 7 A Yes.
 8 Q Do you have any active cases involving Jeffrey
 9 Epstein?
 10 A Yes.
 11 Q How many?
 12 A This one that we're here for today.
 13 Q No, I'm talking -- okay, yes, this one and
 14 what else?
 15 A And another case that I would say involves
 16 him, in that he has intervened in the case and it's a
 17 Federal Court matter relating to some of the victims
 18 that he molested that is directly against the United
 19 States Government.
 20 Q And that is your victims' rights case?
 21 A That's one way to characterize it for sure.
 22 Q Okay. Well, that's what you -- you filed a
 23 lawsuit, correct, against the United States?
 24 A Under the Crime Victims' Right Act, correct.
 25 Q Okay. And that lawsuit is still pending?

1 A Yes.
 2 Q Is it being actively litigated?
 3 A Yes.
 4 Q And is there any other co-plaintiffs in that
 5 case, if that's the right word, besides yourself?
 6 A I'm not a plaintiff in the case.
 7 Q Well, an intervener, are there any other
 8 co-interveners or --
 9 A I'm not an intervener.
 10 Q What are you?
 11 A An attorney representing the plaintiffs.
 12 Q Okay. How many plaintiffs are there?
 13 A In that case there are two.
 14 Q Are there any other cases that you are
 15 involved with or sharing information with, without
 16 getting into what's being shared, and lawsuits pending
 17 against Jeffrey Epstein at this time?
 18 A Other than what I just described, no.
 19 Q Okay. And those suits have been pending for
 20 how long?
 21 A This one has been pending since November 2009,
 22 I believe.
 23 Q Okay.
 24 A And that lawsuit has been -- the Crime
 25 Victims' Rights Act lawsuit has been pending since the

1 summer of 2008. I don't know the exact month.
 2 Q All right. And is it near resolution?
 3 A I don't know.
 4 Q Is -- can you tell me the style of the case?
 5 A Yes, it's Jane Doe I and Jane Doe II versus
 6 United States of America.
 7 Q All right. And the purpose of that lawsuit is
 8 to do what?
 9 A Hold the United States Attorney's Office and
 10 Government responsible for violating the rights of the
 11 victims in that particular case.
 12 Q By entering into a settlement agreement with
 13 Mr. Epstein?
 14 A It has nothing to do with Mr. Epstein. He
 15 voluntarily intervened into the case, had something to
 16 do with discovery that we were trying to get.
 17 Q All right.
 18 A I think Roy Black represents him in that.
 19 Q Okay. And that's for the -- okay, I will let
 20 it go at that for just a minute.
 21 The ultimate result of what you are seeking in
 22 it that suit is what?
 23 A Something that compensates the victims.
 24 Q Financially or otherwise?
 25 A I don't believe the Crime Victims' Rights Act

1 for relief in your complaint, correct?
 2 A Correct.
 3 Q What does your prayer for relief seek?
 4 A Do you have the document to show me, maybe
 5 that would refresh my recollection, I mean I think that
 6 we have filed many pleadings and in one we asked for 25
 7 prayers of relief. I can't recite them all for you.
 8 Q I don't ask you to recite them word-for-word.
 9 Give me a synopsis. You must have an idea since you are
 10 the plaintiffs' lawyer and have been doing this stuff
 11 for 10 or 11 years, give me some idea of what you are
 12 seeking.
 13 A Yeah, I mean, we want a declaration that the
 14 rights were violated, we want some apology-type
 15 information coming from the Government.
 16 Q Right.
 17 A Ultimately, if we got everything that we
 18 wanted -- I can tell you what my clients want, they want
 19 the non-prosecution agreement, the immunity agreement --
 20 Q Umm-hmm.
 21 A -- overturned and for that to allow for
 22 Mr. Epstein to be prosecuted for the crimes that he
 23 actually commit -- committed against them and that --
 24 for which they cooperated with the Government.
 25 Q Okay. And that's been the goal that you have

1 allows for financial recovery.
 2 Q What -- what recovery does it allow?
 3 A Well, that's part of -- that is what that
 4 lawsuit is about, I mean, I think that we have proven
 5 that there was a violation, now we're at a stage where
 6 there is an attempt to uncover what Judge Marra believes
 7 is the appropriate remedy for the violation.
 8 Q All right.
 9 A And I don't know what his result is going to
 10 be.
 11 Q All right.
 12 A It's going to be a judge-made decision.
 13 Q I'm sorry. That lawsuit has been pending
 14 since 2008, you said, correct?
 15 A That was the first of all of the lawsuits that
 16 was filed.
 17 Q All right.
 18 A Yes.
 19 Q And like you said, there is still Jane Doe I
 20 and Jane Doe II are still pending?
 21 A In that case?
 22 Q Yeah.
 23 A Yes.
 24 Q All right. And what does your -- I guess
 25 since you represent the plaintiffs, you filed a prayer

1 been pursuing since you filed it, in essence, isn't it?
 2 A That is their main goal, but then, you know,
 3 at this point, there are many other possibilities.
 4 Q Does the -- I'm sorry, does the successful
 5 prosecution, as it were, by you of that case allow for
 6 attorney's fees?
 7 A I don't believe so.
 8 Q All right. So are you being compensated for
 9 that at this time?
 10 A Not at all.
 11 Q You are doing that completely pro bono?
 12 A Absolutely.
 13 Q All right. How many hours would you say since
 14 2008 you have donated or devoted to that case?
 15 A A lot.
 16 MR. KING: I'm going to object, because now I
 17 think the question of relevancy and materiality of
 18 this line of questioning is -- is --
 19 MR. HADDAD: He has made a -- he has made a
 20 claim for lost time, inability to work, et cetera,
 21 et cetera, et cetera and his claims for punitive
 22 damages as well as for claims for damages for
 23 malicious prosecution and for abuse of process. If
 24 you read his prayers for relief and his answers to
 25 interrogatories and his ability to not work because

1 of this lawsuit and because of the suit that was
2 filed, I think it's totally relevant.

3 MR. KING: Well, I -- I --

4 MR. HADDAD: If you want to instruct him not
5 to answer, we can take it up before a judge.

6 MR. KING: Right. I disagree.

7 MR. HADDAD: It's up to you, Mr. King.

8 MR. KING: I disagree.

9 MR. HADDAD: That's why we have judges.

10 MR. KING: I will allow you some -- some
11 leeway there, but then I'll evaluate it as you go
12 along.

13 MR. HADDAD: Can you give me his answers
14 per diem?

15 BY MR. HADDAD:

16 Q So I will ask the question again, how much
17 time -- and see what the leeway is -- how much time
18 would you say roughly you devoted -- let's -- okay,
19 let's call it since to 2010, since your last deposition
20 'til today, approximately?

21 A I don't know. If you showed me the docket on
22 that case or something that would help me, then I could
23 approximate a little better, but I really don't know.

24 Q All right. Just for -- in your answers to
25 interrogatories, you have been obligated to divert --

1 your response was: "To divert time, effort and attention
2 from the productive practice of his profession to defend
3 tortious misconduct of Epstein. Every minute the
4 verdict -- verdict from his professional pursuits
5 impeded his ability to advance the claims and interest
6 of existing clients and precluded him from taking other
7 and additional responsibilities. Time records made
8 available in response to Epstein's response, request to
9 produce detail, at a minimum, the extent of the
10 diversion he is suffering."

11 So you obviously must have been aware of these
12 when you produced these and filed these responses to
13 interrogatories. I'm just asking for an approximation.

14 A Of what?

15 Q Time spent.

16 A I produced the time I spent on this case.

17 MR. KING: On this case.

18 A I produced it.

19 BY MR. HADDAD:

20 Q I un -- on this case, I never -- I'm talking
21 about the other case, the -- the -- the Federal case,
22 approximately how much time have you spent?

23 A Show me a docket or something and I will help
24 you out there. I just don't know.

25 Q No -- no, I'm just --

1 A I haven't kept my hours on that case.

2 Q All right. You have no independent idea of
3 whether it's one hour, a thousand hours?

4 A It's more than one, less than a thousand.

5 Q Okay. How many hearings would you approximate
6 you have attended in front of Judge Marra?

7 A Since 2010, you said?

8 Q Yeah, let -- I'm going to let -- go over
9 everything in your prior deposition since 2010.

10 A I believe that the answer to that is one or
11 two. I can't remember for sure, but I believe it's only
12 one or two hearings that have taken place since my last
13 deposition.

14 Q And representing the Government is whom?

15 A It was Marie Villafana and Dexter Lee.

16 Q And who's doing it now?

17 A I don't know.

18 Q All right. Could you approximate for me the
19 last time you had a hearing in this case?

20 A I think it was 2011.

21 Q All right.

22 A I'm not sure if there were any in 2012, I
23 don't believe so.

24 Q All right. So the case is just a pending
25 advisement or ruling by Judge Marra, is it just sitting

1 there, is it what?

2 A Judge Marra has many motions that have been
3 fully briefed on his -- on the table right now and we're
4 waiting for rulings. That's -- --.

5 Q All right.

6 MR. HADDAD: Yes, sir (counsel confer outside
7 the hearing of the reporter.)

8 BY MR. HADDAD:

9 Q In fact, there are motions pending right now,
10 correct, you are saying?

11 A Correct.

12 Q Actively pending. So that would stay the time
13 for dismissal for lack of prosecution?

14 A I would think so.

15 Q Well, I think Federal rule is the same as
16 Civil and State, isn't it?

17 A Right.

18 Q You've got a certain amount of time to act
19 upon it. It was dismissed previously for lack of
20 prosecution, correct?

21 A I don't remember it being dismissed. I think
22 they filed a motion to dismiss.

23 Q Okay.

24 A I don't really remember procedurally how that
25 really worked.

1 Q Was that the Government who filed it or was it
 2 someone intervening who filed it?
 3 A It wasn't someone intervening. It was either
 4 the Government filing a motion or the Court sua sponte
 5 issuing -- I don't remember it being an order, but I
 6 remember seeing some notification that it was going to
 7 be dismissed or something along those lines.
 8 Q All right. I think since I started with this,
 9 with the diversion of time, effort, when you started the
 10 law firm in 2000 -- well, 2009 you started the law firm,
 11 correct, October of 2009, your deposition was in
 12 February of 2010; as I recall, correct?
 13 A Okay. I'm taking your word for it.
 14 Q Well, do you think I would bull -- I would
 15 make a misrepresentation to you?
 16 A Not intentionally.
 17 Q Well, I just did because it was March 23rd.
 18 A There we go.
 19 Q I apologize so~.~.~. I forgot we have a video
 20 recording. I almost slipped and thought I was in
 21 trial -- in criminal court.
 22 At any rate, March 23rd, so that would have
 23 been five months after you went into practice, correct?
 24 A Five months after we started --
 25 Q You started the firm?

1 with you from RRA that were your cases besides the
 2 three, you know, LM and all of that stuff, those three,
 3 and stuff that's pending in the case right now, which
 4 would be five total -- four or five total cases,
 5 correct?
 6 MR. KING: Objection, relevancy, materiality.
 7 MR. HADDAD: I'm tying it up to his damages
 8 claim for loss of reputation, et cetera.
 9 MR. KING: Immaterial.
 10 MR. HADDAD: You can instruct him not to
 11 answer. You want --
 12 MR. KING: Not yet. Not yet, but um --
 13 MR. HADDAD: Go ahead.
 14 MR. KING: -- if you are going to try to get
 15 into every case with him --
 16 MR. HADDAD: Not -- not even remote -- not
 17 even remotely, Mr. King.
 18 MR. KING: Okay.
 19 MR. HADDAD: I have been doing this a long
 20 time too. All right.
 21 Go ahead.
 22 MR. KING: Go ahead.
 23 A Tell me your question again.
 24 BY MR. HADDAD:
 25 Q Yeah, how many cases did you take with you?

1 A -- our current law firm.
 2 Q All right. Now, when RRA imploded, you
 3 started the current firm, were all the named partners in
 4 that firm members of RRA?
 5 A Yes.
 6 Q Farmer, Jack. Matt Weissing had been over
 7 there?
 8 A Yes.
 9 Q All right. And you all regrouped. Where are
 10 your offices located now?
 11 A Andrews Avenue.
 12 Q Where?
 13 A 425.
 14 Q Andrews Avenue, north or south?
 15 A Just south of Maguire's, north of Broward.
 16 Trying to give you landmarks you may know.
 17 Q No, nothing is better for you guys than that
 18 law firm, that -- I tell you, I used to be right next to
 19 Grady's. It was even better when I did it. All right.
 20 At any rate --
 21 A I figured you would appreciate the landmark.
 22 Q Yeah, to say the least. Actually, Boyd's Bait
 23 and Tackle is better.
 24 At any rate, so you started the law firm and
 25 approximately how many cases did you have that you took

1 A I don't remember.
 2 Q All right. Would you -- well, let me look
 3 here. One of your claims, I can't remember what I did
 4 with them but I read them someplace. Oh, yeah, the
 5 damage that you suffered is emotional distress,
 6 embarrassment, mental anguish, humiliation, loss of
 7 reputation and standing in the community, loss of value
 8 of time expended in defense of and responding to the
 9 abuse, correct? That's what you said in your answers to
 10 interrogatories; do you want to see them?
 11 A Sure.
 12 MR. KING: Which number is that?
 13 A Yeah. It's an interrogatory signed May 26,
 14 2011, served on me May 16th, 2011. And yes, I believe
 15 that you read that accurately.
 16 BY MR. HADDAD:
 17 Q Thank you. The nuns will be happy where I
 18 went to school.
 19 Do you still maintain these as your damages
 20 that you suffered?
 21 A For the most part, that's about right.
 22 Q All right. What -- what's not right?
 23 A The diversion of time, clearly I diverted a
 24 lot of time that should not have been diverted to
 25 defending against frivolous ac -- accusations and I

1 produced this time record. With respect to reputation,
2 I believe that over the course of the last three years I
3 have done a pretty darn good job resurrecting any damage
4 that was done to my reputation in this community.

5 Q Well, let's -- let's start with that. You
6 don't -- you never had a reputation damage, did you?

7 MR. KING: Objection, form.

8 BY MR. HADDAD:

9 Q Okay. What damage, if any, did you initially
10 have done to your reputation by the filing of a lawsuit
11 against you that suggested that you were so aggressive
12 as a lawyer someone was going to sue you?

13 A No, the lawsuit that was filed against me --

14 MR. KING: Object to form, argumentative.

15 A The lawsuit that was filed --

16 MR. HADDAD: I was paying a compliment.

17 MR. KING: Yes.

18 Go ahead.

19 A The lawsuit that was filed against me said
20 that I was part of some racketeering scheme, said that I
21 was involved in a Ponzi scheme, that I was
22 co-conspirator of Scott Rothstein's and that I was
23 committing fraud and conspiracy to commit fraud. A
24 bunch of criminal actions were alleged against me. In
25 fact, I think the complaint was entirely crimes that I

1 had committed as a lawyer, which is the exact opposite
2 of the type of reputation that you want as a lawyer.

3 With that being said, that complaint, the
4 various motions making those allegations about me being
5 some form of co-conspirator in a Ponzi scheme was
6 repeatedly filed and stated on the record and in
7 hallways over at the bankruptcy court, because every
8 lawyer who was anybody in South Florida had something to
9 do with the bankruptcy proceedings over at the
10 bankruptcy court. So I had to go over there
11 continuously and fend off these lawyers who believed
12 that there must be some merit to it, because somebody
13 who has a lot of money is hiring lawyers who have a
14 pretty good reputation to say these things, there's got
15 to be something to it.

16 BY MR. HADDAD:

17 Q Name one case in which you were impleaded
18 because of your alleged involvement with Scott
19 Rothstein?

20 A I did not lose a single client.

21 Q Name one -- no, name one person who impleaded
22 you, one other person in bankruptcy court, whether it be
23 the clawback scheme, whether it be Shears, whatever the
24 hell he calls what he did, whatever you call any of that
25 stuff, name one person that impleaded you or asked

1 you -- joined you as party or a --

2 A It didn't happen.

3 Q -- defendant or anything?

4 A That did not happen.

5 Q Name one person, other than this lawsuit,
6 which we'll get into later, other than this lawsuit,
7 what newspaper article, what Daily Review article, what
8 any article accused you of being involved in the Scott
9 Rothstein debacle?

10 A I can't recite them off of my head.

11 Q Is there any?

12 A I believe that newspaper articles were written
13 when the lawsuit was filed about me and Scott being
14 accused of being some co-conspirator in a Ponzi scheme,
15 yes.

16 Q All right. There were newspaper articles
17 written quoting a pleading as opposed to someone
18 suggesting you committed a criminal act; is that
19 correct?

20 A I don't know the distinction that you are
21 trying to make.

22 Q We'll worry about that later, I'm just asking
23 you, do you know whether or not it was someone quoting a
24 newspaper -- a -- a -- a legal pleading, or was it a
25 individual making an accusation that you were a

1 criminal?

2 A The legal pleading made an accusation that I
3 was a criminal and that was reported on.

4 Q I'm asking you, was there anything other --
5 was there any person, reporter, anyone, any of the
6 people you had all of these thousands of e-mails with,
7 anyone who suggested that you were a criminal, other
8 than the pleading filed that suggested because of
9 Rothstein's inclusion of your cases as part of the basis
10 for his Ponzi scheme that you were involved, other than
11 that lawsuit?

12 A People believed that I was involved.

13 Q Who expressed that to you? You're a young
14 lawyer, you're in the courthouse every day or almost
15 every day, you're around town, correct?

16 A Yes.

17 Q You go to different restaurants. Name one
18 person that came up to you and said, I can't believe you
19 are not in jail, you are a Ponzi scheme or you are
20 anything, name one person --

21 A There were lawyers over at the bankruptcy
22 court, when I had to sit there listening to the things
23 that were being said, that told me, you are going to be
24 a target of mine given this information that we --
25 that -- that is being told to us by Jeffrey Epstein and

1 his lawyers.
 2 Q Let me ask you this as a lawyer. Let me ask
 3 you this as a lawyer. You are a prosecutor, correct?
 4 A Yes.
 5 Q And I read in your deposition you didn't do
 6 RICO cases and you didn't really do economic crimes,
 7 correct?
 8 A Right.
 9 Q All right. Did you investigate cases?
 10 A Yes.
 11 Q Okay. And you're aware that in the instance
 12 of this case that Mr. Rothstein used, and I mean it's
 13 hundreds of pages to your depo that I'm not going to
 14 reinvent the wheel on or 10's of 20 pages that
 15 Mr. Rothstein had your boxes and your cases included in
 16 a room right upstairs here where he brought in
 17 investors, correct?
 18 A I am aware of that.
 19 Q And he used your cases, Bradley Edwards' cases
 20 to lure investors into his fraudulent schemes, you've
 21 testified to that in bankruptcy court and other courts,
 22 haven't you?
 23 MR. KING: Objection, form.
 24 MR. HADDAD: Oh, excuse me, you are right
 25 counsel, I'll try.

1 obviously, that Scott preyed upon you, as it were. You
 2 were one of Scott's victims. No -- no -- incredibly --
 3 not -- not incredibly because Scott would do that to
 4 anybody, you were one of Scott's victims. He didn't
 5 care two cents about using you; would you agree?
 6 A Clearly.
 7 Q Obviously, he put you in that position,
 8 correct?
 9 A Clearly.
 10 Q He brought you in and every single investor,
 11 whether they were criminal investors or not criminal
 12 investors, were led to believe that Bradley Edwards was
 13 assisting him and using his cases to promulgate these
 14 settlements, correct?
 15 A I don't know that at all --
 16 Q All right. Well, you've heard that from
 17 Sheer--
 18 A -- to be true.
 19 Q -- when he won his verdicts and his lawsuits,
 20 didn't you? I am just asking --
 21 A No.
 22 Q -- if you familiarized yourself with --
 23 A No.
 24 Q -- that tome that he filed that he called a
 25 complaint?

1 BY MR. HADDAD:
 2 Q You are aware of that, correct?
 3 MR. KING: The same objection.
 4 A Now? Yeah.
 5 BY MR. HADDAD:
 6 Q Yes.
 7 A Yes.
 8 MR. KING: The same objection. It's compound.
 9 I don't know what question you are asking him --
 10 MR. HADDAD: Oh, he understood it, he
 11 answered.
 12 MR. KING: Not necessarily.
 13 MR. HADDAD: Oh, okay.
 14 MR. KING: But then the answer would be --
 15 MR. HADDAD: Strike the whole thing, okay.
 16 I'll do it over again.
 17 THE COURT REPORTER: Counsel, would you stop
 18 interrupting him at the same time. I only can get
 19 one down at the same time, please.
 20 MR. HADDAD: Just hold up your hand and I'll
 21 stop.
 22 MR. KING: Okay.
 23 MR. HADDAD: All right.
 24 BY MR. HADDAD:
 25 Q So you were -- sorry. You were aware,

1 A Because of how long it was, I may have read
 2 10 pages of it. But it was 2,000 or 3,000 pages --
 3 Q Did you find it to be grammatically correct at
 4 all?
 5 A In the first 10 pages, I don't remember.
 6 Q Sheer doesn't like me, so I don't care. At
 7 any rate.
 8 All right. So you -- you realized what
 9 happened there, they used your cases, et cetera. Now,
 10 let me -- just -- just because you brought this up at
 11 the other part I want to go into, is there was an
 12 unfiled Federal case, correct, that you have been asked
 13 about a bunch of times with the misspelled names,
 14 something or another, 290-page complaint or 240-page
 15 complaint?
 16 A About me?
 17 Q No, not about you, about another Pon -- about
 18 another alleged Epstein victim that was unfiled that
 19 Scott was showing when he needed money?
 20 A I don't know that.
 21 Q You don't know anything about it?
 22 A Scott was showing~.~.~.
 23 Q Scott -- excuse me, did -- was there ever a
 24 complaint that was filed but never served in this case
 25 and against Mr. Epstein?

1 A A complaint that was --
 2 Q Umm-hmm.
 3 A -- filed but never served --
 4 Q Yeah.
 5 A -- against Epstein?
 6 Q Yeah, a complaint that was --
 7 A By Scott Rothstein?
 8 Q No, by you? You signed it --
 9 A Oh, did I?
 10 Q Yeah. And it was a misspelling of some type.
 11 A Fred, just ask me a question, I will answer
 12 it. You are asking so many different things. I don't
 13 know what you are talking about.
 14 Q Do you remember filing another lawsuit at the
 15 time Rothstein's Ponzi scheme was falling apart?
 16 A Did I file a lawsuit --
 17 Q Yes --
 18 A -- when Scott Rothstein's --
 19 Q -- that was never served?
 20 A -- Ponzi scheme was falling apart?
 21 MR. HADDAD: Let me just see, Jack. Do you
 22 want to take over?
 23 BY MR. HADDAD:
 24 Q Okay. You don't remember a Federal court
 25 case?

1 A About Jeffrey Epstein.
 2 Q Umm-hmm.
 3 A Or about -- it had nothing to do with
 4 Rothstein?
 5 Q No, Jeffrey Epstein.
 6 A Okay.
 7 Q A lengthy Federal case against Mr. Epstein?
 8 A I filed Federal complaints against Jeffrey
 9 Epstein before.
 10 Q Okay. Do you recall one that was filed that
 11 was never served that contained a misspelling of
 12 someone's name? I'm just asking if you recall. If you
 13 don't recall it, you can tell me.
 14 A I recall filing a complaint against him that
 15 was never served. I don't know about a misspelling or
 16 what we are talking about.
 17 Q Do you recall filing one against him that was
 18 never served, correct?
 19 A I do recall filing a complaint against him.
 20 It was never served.
 21 Q How long was that complaint?
 22 A I don't know. If you have it, I will look at
 23 it. It will definitely help to refresh my recollection.
 24 It was long, because I know why I filed it and I know
 25 how many counts that there were.

1 Q Why did you file it?
 2 THE WITNESS: Is it okay for me to answer
 3 that?
 4 MR. KING: No, at this point --
 5 THE WITNESS: Don't mind answering it.
 6 MR. KING: -- I see no relevancy or
 7 materiality to this line of inquiry. It has
 8 nothing to do with damages, it has nothing do with
 9 the elements of the claims --
 10 MR. HADDAD: It has everything to do with --
 11 MR. KING: -- against Mr. Epstein.
 12 MR. HADDAD: Okay. I'm -- I'm not arguing
 13 with you. It has a lot to do with his loss of
 14 reputation, as everything that he said that
 15 happened with Scott Rothstein, he said his
 16 reputation was destroyed by this case, by this man.
 17 MR. KING: Correct.
 18 MR. HADDAD: His reputation, he has already
 19 admitted, was partially destroyed by Scott
 20 Rothstein by including him in his Ponzi scheme.
 21 However you want to slice it later for a jury is
 22 one thing or another.
 23 THE WITNESS: Can I just talk to Bill outside
 24 and I think that I will be able to answer the
 25 question for you?

1 MR. HADDAD: Yeah, go ahead.
 2 THE VIDEOGRAPHER: The time is 10:47 a.m. We
 3 are now coming off the video record.
 4 (Thereupon, a discussion was had off the
 5 record.)
 6 THE VIDEOGRAPHER: The time is 10:50 a.m. We
 7 are now back on the video record.
 8 BY MR. HADDAD:
 9 Q Do you recall when it might have been that
 10 Mr. Rothstein was deposed about who was involved in the
 11 Ponzi scheme, do you recall when the first time might
 12 have been?
 13 A No.
 14 Q There came a point in time where Mr. Rothstein
 15 stated that he was certain that you were not involved in
 16 the Ponzi scheme, you had no knowledge of a Ponzi scheme
 17 and that he had used all of your cases without your
 18 knowledge, correct?
 19 A The first two parts of that, I was in a
 20 deposition, yes. That he said he used all of my cases
 21 is not true.
 22 Q Okay, I don't mean all of your cases. He used
 23 some of the cases against Epstein as a basis for his
 24 Ponzi scheme?
 25 A I think I understand what you mean, I am not

1 trying to be difficult but I'm just going off what you
 2 said.
 3 Q Be difficult, it's fine with me.
 4 A I don't want to be. I want it to be over with
 5 so go ahead.
 6 Q It will be over with tomorrow.
 7 A At this rate, for sure.
 8 Q So at any rate, Rothstein had said what he
 9 said in the deposition, the deposition speaks for itself
 10 but --
 11 A Right.
 12 Q -- do you recall --
 13 A I was there.
 14 Q -- when was that deposition?
 15 A I don't remember.
 16 Q Do you recall the year?
 17 A Can you show me the deposition? It was either
 18 2011 or 2012.
 19 Q Okay. When he was deposed for those days that
 20 Judge Bray -- Judge Cohn allowed?
 21 A Deposed in this case I think --
 22 Q Yes.
 23 A -- that your daughter took the deposition.
 24 Q Do we -- she's old, can you refer to her as
 25 co-counsel? All right. She took the deposition. All

1 right. And that was -- that was the video deposition as
 2 opposed to Scott being in person when he was over the
 3 grand jury room, correct?
 4 A I didn't even know that happened, so, yes,
 5 that's when it was.
 6 Q All right. Now, that would have been within a
 7 year, year and a half later ago, correct, something like
 8 that; would that be accurate?
 9 A I'm not going to quarrel it, if you are
 10 telling me --
 11 Q Yeah.
 12 A -- that's what it was, that's it.
 13 Q All right. And at that point in time, any
 14 person who knew anything at all or was following the
 15 case would have learned that Scott Rothstein
 16 affirmatively stated you had no involvement?
 17 A I agree with that.
 18 Q Okay. Do you know whether or not he had made
 19 that representation to others prior to that in other
 20 depositions or in debriefings or anything that was
 21 communicated to you by any individuals?
 22 A No.
 23 Q All right. I know from the way the deposition
 24 was asked the last time that you were asked -- let me
 25 see how I want to do this.

1 You became aware of certain members of RRA
 2 becoming targets or noticed of being persons of interest
 3 to the Federal Government, correct?
 4 A I don't know that I remember that.
 5 Q Well, you know that?
 6 A I mean, now I know things now. It's hard to
 7 rewind time remembering --
 8 Q No, I'm talking about --
 9 A -- when I learned them.
 10 Q I didn't mean to interrupt you. After the
 11 firm imploded, based upon just publicity or whatever,
 12 you were aware that certain persons were implicated in
 13 the scheme, correct?
 14 A Correct.
 15 Q And you are aware that -- let me ask you this:
 16 At any point in time, did you request or seek counsel,
 17 without asking anything about that, to make inquiry to
 18 the Federal Government about yourself?
 19 MR. KING: Objection.
 20 A No.
 21 MR. KING: It's irrelevant.
 22 MR. HADDAD: Okay.
 23 MR. KING: Irrelevant and immaterial and it
 24 would be privileged.
 25 MR. HADDAD: Not if he asked if he saw -- not

1 if I don't ask him what he said. At any rate, I
 2 will let it go and take it up later.
 3 BY MR. HADDAD:
 4 Q All right. Let me go on to something else.
 5 We are talking about 2009.
 6 A Okay.
 7 Q You're a lawyer how many years now?
 8 A In 2009 or now?
 9 Q Now, now, now, now.
 10 A Didn't we start here.
 11 Q Yeah, I know, I just can't remember.
 12 A 2013, minus, I mean~.~.~.
 13 Q I'm old, Brad.
 14 A Eleven and a half years.
 15 Q All right. Now, your reputation, obviously,
 16 there is no loss of reputation for you, correct?
 17 A We just went through this.
 18 Q No, I am going to go through it in detail.
 19 A Did --
 20 Q You have no loss of reputation, correct, your
 21 reputation has expanded immensely since the Epstein
 22 cases, correct?
 23 MR. KING: Objection to form, it's
 24 argumentative.
 25

1 BY MR. HADDAD:

2 Q Well, let me ask you this: In --

3 A Do I believe that right now my reputation is
4 better than it has been at any time in the past, yes.

5 Q All right. And as a matter of fact, since the
6 Rothstein case, you're now included, probably one of the
7 youngest guys there is, in Best Lawyers in America,
8 correct?

9 A Probably.

10 Q All right. There are not many guys that have
11 been practicing 11 years to be included in that.

12 A I agree.

13 Q And that is 100 percent for old people like
14 Goldberger, for the most part. You are included in that
15 based upon peer review and nothing else?

16 A That's true.

17 Q You --

18 A I mean, I don't ac -- actually don't know the
19 answer to that. I -- if you are saying that's what it
20 is, it might be.

21 Q Did you solicit anybody to become in that?

22 A No.

23 Q Did you receive a letter saying you have been
24 nominated for Best Lawyers in America?

25 A I don't think so.

1 Q No, you just got a notice one day that you --

2 A Right.

3 Q -- are included, correct?

4 A Right, that's true.

5 Q Out of the whole world, out of thousands of
6 lawyers practicing law 10 years, you are notified, hey,
7 you are one of the best lawyers in America for what you
8 do?

9 A Right.

10 Q Okay. Now, you also are one of the top 40
11 lawyers under 40, correct?

12 A Right.

13 Q You are 37 years old?

14 A Correct.

15 Q And you are considered one of the top trial
16 lawyers in Florida?

17 A Right.

18 Q There is a group called the Top 100 Trial
19 Lawyers in America, correct?

20 A I think so.

21 Q That's part of what you are in?

22 A Okay.

23 Q Yeah, they have the top 100 trial lawyers for
24 old guys like Goldberger, Scarola, part of his firm and
25 all those old people, correct?

1 A Maybe I should pay more attention to those
2 things. I don't know about all those old people.

3 Q Well, you do have -- I look at it from what
4 you do with them. Come on Brad, you have an ego,
5 everybody does. At any rate, you are considered in the
6 top 40 under 40, in that group, correct?

7 A Right.

8 Q And have you ever looked on the Web site for
9 that group to see the type of lawyers that are included
10 in that?

11 A No.

12 Q Okay. And you have that distinction of being
13 included and you promote it with your -- as most lawyers
14 would, correct?

15 A Personally, I don't, but I know that my law
16 firm does. I mean, we do have a PR firm for our law
17 firm.

18 Q Oh, is that who does all of that stuff?

19 A Yeah.

20 Q I mean, this is about a month's worth. All
21 right.

22 A You looked at a lot more than I have.

23 Q I have to do something to earn the money I
24 make.

25 A Thank goodness, right.

1 Q Now, you are also -- there is another service
2 called AVVO, are you familiar with that?

3 A Yes.

4 Q All right. And that's another unsolicited --
5 out of the top 40 under 40, you can't buy your way into
6 that one either, you didn't know you were getting that,
7 correct?

8 A That's true.

9 Q You get a notice, hey, you have just been
10 included in all of this stuff, whether you like it or
11 not, you are considered one of the top lawyers in
12 Florida.

13 A That's true.

14 Q Okay. Then you have AVVO where people can
15 arrest -- arrest, I see arrest records, two secrets
16 under your name here. I guess that is part of the
17 advertising that goes with having a Web site or
18 something. Five Farmer, Jaffe, Weissing attorneys
19 recognizes the best lawyers in America, that is pretty
20 good for a bunch of young lawyers, yeah?

21 A Yeah.

22 Q And AVVO, another one. Do you participate in
23 their promotion, AVVO, they promote lawyers I think, do
24 you participate in that at all?

25 A Not really.

1 Q Okay.
 2 A I answered one question one time.
 3 Q Yeah, about herpes or something?
 4 A I participate a lot less than everybody else
 5 in my law firm, yes.
 6 Q Okay. But I am just saying, you got -- they
 7 rated you without your request, correct?
 8 A That's true.
 9 Q And they rated you as a superb lawyer?
 10 A Okay.
 11 Q Yes or no?
 12 A I don't know.
 13 Q Let me -- well --
 14 A You keep up with this more than I do. I'm
 15 telling you, I don't -- I don't --
 16 Q I didn't keep up with this at all.
 17 A I don't know these things.
 18 Q I don't know how to use computers. Somebody
 19 did this for me.
 20 A Show me what it is and I'll --
 21 Q Yeah. Do you think I care about looking up
 22 Brad Edwards?
 23 A Apparently.
 24 Q I don't even look up myself.
 25 A Exactly, that's my point.

1 has something to do with him that my reputation has
 2 improved, I just wanted to make that clear.
 3 Q Well, you don't know what's improved your
 4 reputation. Reputation is what the community thinks of
 5 you, you don't know where it comes from.
 6 A Well, it's certainly not from becoming accused
 7 of being a Ponzi schemer, that's for darn sure.
 8 Q You don't know who voted on your reputation,
 9 maybe it was --
 10 A You.
 11 Q Actually, we will go from there because I
 12 don't want to be argumentative, I don't want to get your
 13 counsel objecting. I am trying to keep him happy here.
 14 At any rate, and -- so for reputation in the
 15 community, you have never asked any lawyers to state
 16 their opinion of you, correct?
 17 A That's right.
 18 Q Or any other members of the public, correct?
 19 A Right.
 20 Q Okay. So let's see, all within 20 days,
 21 24 days in 2013, you have people rate you on lawyers.com
 22 five out of five is what an excellent exceptional
 23 attorney you are, correct?
 24 A I don't even know what that Web site is. This
 25 is the first time I have seen.

1 MR. GOLDBERGER: Someone did it for me.
 2 MR. HADDAD: Oh, someone did it for you?
 3 MR. GOLDBERGER: Look at the number.
 4 MR. HADDAD: What?
 5 MR. GOLDBERGER: 10.0.B.
 6 MR. HADDAD: 10.0?
 7 A Yep. I don't know --
 8 BY MR. HADDAD:
 9 Q Okay. You're rated as a superb lawyer,
 10 correct?
 11 A Okay. Yes.
 12 Q Okay. Now, that's not a bad reputation to
 13 have at 11 years out, correct?
 14 A No, I -- I agree, I said that from the
 15 beginning.
 16 Q All right. And 2009, 2010, you didn't have
 17 any of these accolades?
 18 A I -- I agree with that. I think that's right.
 19 Q Okay. So that's evolved in the last two
 20 years, okay; would you agree with that?
 21 A Yes.
 22 Q All right. And then --
 23 A I think it has a lot to do with jury verdicts
 24 that I have received that have nothing to do with
 25 Epstein but just to the extent that you are implying it

1 Q I don't either, I'm just -- I just saw it.
 2 You don't know?
 3 A News to me, no.
 4 Q Well, I mean, but that's part of your
 5 reputation is what -- is news to you is that you don't
 6 even know what's going on or where it's coming from but
 7 that's your reputation.
 8 A I don't disagree with you.
 9 Q Okay. Yeah, I mean, I am blowing -- I can't
 10 say the word. I'm making you look good. Okay, now, the
 11 other thing you're in it is for your verdicts, correct,
 12 you are in for the publication for some of the verdicts
 13 you have received?
 14 A Right.
 15 Q Okay. And how much money do you think you
 16 have made in the last two years on verdicts nothing to
 17 do with Epstein, gross verdicts, you won the money over
 18 at Jacksonville?
 19 A Over -- over 20 million.
 20 Q Over 20 million. Let's see, again, okay.
 21 That's more than probably 90 percent of the PI lawyers
 22 in the state; wouldn't you agree?
 23 A I would agree.
 24 Q That's probably more than Jon Krupnick made
 25 the last couple years?

1 A I don't know that.
 2 Q Okay. How about Skip Campbell, you are
 3 buddies with him?
 4 A I never talked to him in my life.
 5 Q Oh, you didn't, I thought you knew him.
 6 A No, I don't know him.
 7 Q So you made 20 million in verdicts in the last
 8 two, three years?
 9 A Right.
 10 Q Okay. And how many -- how much money has your
 11 firm had in gross verdicts in the last couple of years,
 12 let's say the last since 2009, when you all split
 13 with -- well, you didn't split with Rothstein when you
 14 were, I want to say disemboweled, but, I guess,
 15 disengaged with that law firm, how much money has --
 16 what's the name, Farmer, Jaffe, let me just use short
 17 for that?
 18 A I tried the vast majority of our cases at that
 19 firm.
 20 Q Okay. How much -- well, did Gary Farmer win a
 21 big verdict recently or a settlement?
 22 A Maybe that, but --
 23 Q Settlement was how much?
 24 A -- you know the difference.
 25 Q Yeah. Do I know the difference? A little

1 bit, not much.
 2 A Yeah. Exactly.
 3 Q How much did Farmer settle for?
 4 A He has had a bunch of them.
 5 Q How much would you say he's settled for, he
 6 has had some -- didn't he have a big qui tam suit, or
 7 whatever you call them?
 8 A He has had several of them, yes.
 9 Q How much did he settle for?
 10 A Hundreds of millions of dollars.
 11 Q More than that, no, didn't he settle one for a
 12 billion?
 13 A I think that predated our current firm though.
 14 Q Oh, okay. So hundreds of millions of dollars
 15 coming into your firm from him in settlements?
 16 A I mean, that's a different question that I'm
 17 not willing to answer but~.~.~.
 18 Q Okay.
 19 A And it has nothing to do with me, I mean,
 20 it's --
 21 Q And that was my next question. You guys are
 22 all independent, as far as your compensation? I'm not
 23 going to get into how much you make right now.
 24 A Not necessarily.
 25 Q Okay.

1 A To some extent we are dependent and --
 2 Q All right.
 3 A -- to some extent we are independent.
 4 Q Do you own your own building over there?
 5 A No, we don't own the building.
 6 Q All right. Okay. Can -- let's go to
 7 emotional distress. Tell me about the emotional
 8 distress that you suffered. Well, let me back up by
 9 this.
 10 You were sued by abuse of process by some guy
 11 in the joint, weren't you, do you remember?
 12 A No. Are you talking about him?
 13 Q You, you were sued.
 14 A By who?
 15 Q Oh, my God, I got to go find it now. I guess
 16 if you didn't know you were sued, you can't have a whole
 17 lot of emotional distress. Where is it?
 18 A I was -- I know that I was sued by Jeffrey
 19 Epstein, is that what you are talking about?
 20 Q No. He's -- no, he is not in the joint.
 21 Excuse me --
 22 A I understand that.
 23 Q -- someone who is in Florida State Prison, an
 24 individual has sued you along with Michael Gates.
 25 A Really?

1 Q Yes. You weren't aware of that?
 2 A No.
 3 Q Okay.
 4 A But I -- I -- definitely I am interested in
 5 seeing it.
 6 MS. HADDAD COLEMAN: Hollywood Police
 7 Department.
 8 BY MR. HADDAD:
 9 Q See I --
 10 A Oh, oh, okay. All right. Oh, Hollywood
 11 Police Department?
 12 MS. HADDAD COLEMAN: Yes.
 13 A I know that case. I don't know that we were
 14 sued for abuse of process, I don't know what it was
 15 but --
 16 BY MR. HADDAD:
 17 Q Okay.
 18 A I am aware generally that we were sued by
 19 Donald Baker.
 20 Q Were you a -- still a state attorney at the
 21 time?
 22 A No, I had left the State Attorney's Office. I
 23 think the AG's office covered it, that's why I've had
 24 zero involvement in it. But --
 25 Q I understand that. I'm sorry, let me -- let

1 me let you finish your question.
 2 A Donald Baker, is that the --
 3 MS. HADDAD COLEMAN: No, it's different.
 4 THE WITNESS: Oh, different.
 5 BY MR. HADDAD:
 6 Q Oh, you got sued twice?
 7 A Apparently.
 8 Q All right. And then did -- let me ask you
 9 about the -- I had it right here.
 10 A I convicted some guy, he went to prison and
 11 then sued the judge and every -- all the police and
 12 everything else.
 13 MR. GOLDBERGER: Here you go.
 14 MS. HADDAD COLEMAN: This guy's name is
 15 different.
 16 MR. HADDAD: Yeah, Shaarbay, Sharbasom. I
 17 guess that must be --
 18 MR. GOLDBERGER: Spell it.
 19 MR. HADDAD: -- the Arab guy. S-H-A-A-R-B-A-Y
 20 versus --
 21 A News to me.
 22 BY MR. HADDAD:
 23 Q -- various persons. Were you ever served with
 24 a lawsuit? Among the persons sued was --
 25 A No.

1 Q -- Pete Weinstein, Michael Gates, Finkelstein,
 2 Satz, Dan Callahan, Brad Edwards.
 3 A No. I don't recognize that person's name. I
 4 have never been served with that lawsuit, to my
 5 recollection.
 6 Q To your recollection, okay.
 7 A No.
 8 Q All right. But you said there was another
 9 one, who else sued you?
 10 A Donald Baker sued me and Mike Satz and Michael
 11 Gates and all of the Hollywood Police Department.
 12 Q And what happened with that case?
 13 A It was dismissed.
 14 Q All right. Would those predate the time that
 15 you were sued by Mr. Epstein?
 16 A Yes.
 17 Q Okay. Now, tell me how --
 18 A Well, I don't know about this new one that you
 19 just told me about it, it may have been yesterday for
 20 all I know.
 21 Q All right.
 22 A I am unaware of it.
 23 Q Emotional distress, embarrassment, mental
 24 anguish, humiliation, I will start with those, because
 25 we know loss of reputation and standing in the community

1 doesn't exist, correct?
 2 MR. KING: Objection.
 3 BY MR. HADDAD:
 4 Q You concede that?
 5 MR. KING: Objection, argumentative.
 6 BY MR. HADDAD:
 7 Q Well, would you concede -- never mind, we went
 8 through it already.
 9 A Yeah, we -- we talked about this.
 10 Q I understand. Can you detail for me the
 11 emotional distress, embarrassment, mental anguish and
 12 humiliation --
 13 A Okay.
 14 Q -- that you have?
 15 A Where I was beginning before --
 16 Q Yes, sir.
 17 A -- when we were talking about reputation. I
 18 do believe that I have always practiced with the utmost
 19 honest, integrity. And when a lawsuit was filed against
 20 me accusing me of being dishonest and being a criminal
 21 or -- to truncate this -- and I had to continue to go to
 22 court and see lawyers who, for a period of time, and I
 23 do believe that once the case was dismissed against me,
 24 that window closed, but for a period of time they
 25 believed the allegations against me. I think that there

1 was probably a point in time, based on some of the
 2 e-mails that I have seen, that your co-counsel Tonja
 3 believed that, which in terms of hurt feelings type of
 4 things, yeah, that -- that wasn't -- that wasn't
 5 something that I appreciated either. But having to be
 6 in a courtroom where lawyers believed that I had done
 7 these things that I had not done, it was humiliating.
 8 Now there is another aspect of it which I
 9 consider to be much more significant, because as we've
 10 discussed, the case was dismissed against me and I do
 11 feel that separate and apart from any involvement that I
 12 have had prosecuting cases against Jeffrey Epstein, I
 13 have done a good job of resurrecting my reputation from
 14 the point in time where people initially believed, hey,
 15 where there is smoke there is fire or something -- this
 16 guy must be guilty of something. And that was my
 17 perception of things and that's a reasonable perception
 18 based on what was filed.
 19 Q All right. And I don't want -- I am not going
 20 to be argumentative with you, obviously, but based upon
 21 what the entirety of what the Ponzi scheme is, just
 22 being involved in it, just being in that firm with your
 23 cases there would give that perception to people,
 24 wouldn't you agree?
 25 A No. I think that most lawyers escaped fairly

1 unscathed and nobody thought that 60 lawyers were
 2 involved in a Ponzi scheme. I -- me and your client,
 3 Russ Adler, are two of the only that have been pinned as
 4 co-conspirators of Scott Rothstein's.
 5 Q No, I would say there have been others.
 6 A Well, you would know better than I.
 7 Q Of course.
 8 A But publicly -- well, that was my perception.
 9 Q And I noticed Adler is still out there trying
 10 cases, he just won three million bucks down in Miami
 11 with some lawyer.
 12 A He is a good lawyer.
 13 Q Okay. And you are a good lawyer.
 14 A Right.
 15 Q All right. And I want to know exactly where
 16 you were humil -- all right, I understand no one likes
 17 getting sued and no one likes being accused of anything,
 18 how did it impact you, this emotional distress,
 19 embarrassment and mental anguish, how did it manifest
 20 itself that we can put a -- a -- anything on it. Did
 21 you ever not go to court?
 22 A No, I -- I always fulfilled my obligations.
 23 Q Did you seek -- did you seek mental -- uh,
 24 what do they call those people, mental health helpers --
 25 A No.

1 about and who he doesn't care about and I know the kinds
 2 of things that he has done in the past, how he lives his
 3 life and what he is capable of doing to me and what I
 4 believed that he would do to me. So yeah, it's all
 5 about him.
 6 Q All right. And let's go there. So everything
 7 is about Jeffrey Epstein because he sued you, as opposed
 8 to anyone else in the world?
 9 A Yeah.
 10 MR. KING: You know, I'm going to -- let me --
 11 let me interject here. I was at a prior deposition
 12 where Mr. Epstein was here and it's the same facial
 13 expressions, the same unprofessional attitude that
 14 he is displaying here that he displayed then. So
 15 I'm just going to ask you to instruct him to
 16 maintain a poker face, to the extent he is able to
 17 do it. It is distracting. I don't know if it is
 18 distracting to the witness, but it is certainly
 19 distracting to me because I can hear it and I can
 20 feel it and I can see it and it should not happen
 21 in deposition of a case of this magnitude or
 22 frankly in any case.
 23 MR. HADDAD: I'm sorry, I have no peripheral
 24 vision so I don't see anything because I'm looking
 25 to him.

1 Q -- you know, like psychologists or anything
 2 like that?
 3 A I did not.
 4 Q Did you go to a doctor to get Xanax?
 5 A Nothing.
 6 Q Did you lose sleep?
 7 A Of course I lost sleep. I mean, but you would
 8 lose sleep from getting these types of allegations
 9 anyway. But I will tell you that it was who was suing
 10 me that caused the emotional distress.
 11 Q Because he's so rich or because of what? I
 12 mean, people sue people all the time. Are you going to
 13 say because it was Epstein as opposed to if I sued you
 14 for some reason, for some God-known reason?
 15 MR. KING: Objection to form.
 16 A That would cause a lot less emotional
 17 distress.
 18 BY MR. HADDAD:
 19 Q Okay.
 20 MR. KING: Objection to form.
 21 BY MR. HADDAD:
 22 Q All right. Well --
 23 A Yes, I am saying it was because it was Jeffrey
 24 Epstein who sued me, because I know him, I know who he
 25 is, I know what he is capable of. I know who he cares

1 MR. KING: Well --
 2 MR. HADDAD: I'm sure somebody will suggest
 3 something to plaintiff or counter-defendant,
 4 whatever he is, on what to do, okay.
 5 MR. KING: All right. Thank you.
 6 BY MR. HADDAD:
 7 Q I don't have the same fears apparently that
 8 Mr. Edwards has.
 9 A You don't know him.
 10 Q Pardon me?
 11 A You don't know him and he didn't sue you. You
 12 weren't a target of his.
 13 Q Do you know who I represent? Do you think
 14 this bothers me?
 15 A I know who you represent now.
 16 Q Not him. Do you think this will bother me?
 17 You have been a lawyer for how long?
 18 A I think this is the fourth time we've gone
 19 through this.
 20 Q Well, I know that, and how many people -- when
 21 you were a prosecutor, how many people did you put in
 22 prison?
 23 A A lot.
 24 Q All right. And you got sued by people,
 25 correct?

1 A Right.
 2 Q Did you get threatened by people when you were
 3 putting them in prison?
 4 A To some extent.
 5 Q Yeah, you were a prosecutor, you --
 6 A Yeah.
 7 Q -- were threatened by criminals, correct?
 8 A Right.
 9 Q People that were going to prison?
 10 A Yeah.
 11 Q They threatened to kill you, they threatened
 12 to get even with you, all kind of stuff, correct?
 13 A Right.
 14 Q And you were a -- I was going to slip again --
 15 you were a hard-nosed prosecutor?
 16 A That's true.
 17 Q All right. And you had the biggest -- I can't
 18 think of him without saying anything, the hardest
 19 unyielding judge there was in Michael Gates, correct?
 20 A Great judge.
 21 Q There was no amount of prison time that was
 22 not enough for him, great judge as you said, correct?
 23 A I don't know if that's correct, I don't agree
 24 with that.
 25 Q Well, he was worse than -- well, you don't

1 remember Futch, you weren't born yet. He was the
 2 toughest judge on the criminal bench at the time you sat
 3 there and you were the toughest judge {sic} in his
 4 division -- toughest prosecutor in his division.
 5 A I'll agree with the second part.
 6 Q Okay. And you were plainly considered by many
 7 defense lawyers, which may be a compliment to you, as
 8 unreasonable. You certainly didn't give any quarter if
 9 you didn't have to, correct?
 10 A I would agree with that.
 11 Q Okay. And I never had a case with you so I
 12 can't say much.
 13 A You had one.
 14 Q Did I?
 15 A Yeah.
 16 Q It must have been unpleasant.
 17 A It was ridiculous and stupid.
 18 Q Who, me or you?
 19 A You were actually funny.
 20 Q I'm making you laugh today.
 21 A You always do, Fred. Your client stuck some
 22 dead fish under someone's floorboards. I told you it
 23 was funny.
 24 Q Oh, yeah, I got an XKE and a Ferrari out of
 25 the guy.

1 A I -- I know. You also told everybody in the
 2 courtroom that on that day, very, very loudly. I
 3 remember.
 4 Q That's right, Marty Vanskyhawk.
 5 A That was it.
 6 MS. HADDAD COLEMAN: He needs to stop paying
 7 my exterminator apparently.
 8 MR. HADDAD: He stuck dead fish down the eaves
 9 of the house when they went to throw him out?
 10 A Correct.
 11 Q Barracudas and Wahoo?
 12 A Exactly.
 13 Q Yes. And If you were Norwegian, you would
 14 have called it lutefisk and ate it.
 15 A And you actually had it with Jody, but she
 16 wasn't there that day, so I had to deal with you and him
 17 and the whole mess.
 18 Q Well.
 19 A So yes.
 20 Q Okay. So, let's face it, you -- you --
 21 A And he went to prison for fish.
 22 Q He went to prison for fish.
 23 A Right.
 24 Q So did Jerry Chilli when I represented him.
 25 Of course, he was a Mob kingpin. Excuse me.

1 (Thereupon, a discussion was had off the
 2 record.)
 3 MR. HADDAD: I can remember the point I was
 4 trying to make. I'm not your age yet.
 5 THE VIDEOGRAPHER: Counsel.
 6 BY MR. HADDAD:
 7 Q All right. So --
 8 MR. GOLDBERGER: Okay. Fred, five minutes
 9 until the tape change.
 10 MR. HADDAD: I'm sorry?
 11 MR. GOLDBERGER: Can you read?
 12 MR. HADDAD: Oh, yeah, let's take a break now.
 13 THE VIDEOGRAPHER: The time is 11:15 a.m.
 14 MR. HADDAD: I've got to take a glass of
 15 water.
 16 THE VIDEOGRAPHER: We are now coming off the
 17 video record. This is the end of Tape No. 1.
 18 (Whereupon, a break was taken.)
 19 THE VIDEOGRAPHER: The time is now 11:27 a.m.
 20 We are now back on the video record. This is the
 21 start of Tape No. 2.
 22 (Thereupon, a discussion was had off the
 23 record.)
 24 BY MR. HADDAD:
 25 Q All right. Sir, let me ask you this: You

1 talked about your firm has a PR department, correct?
 2 A That's correct.
 3 Q Which is not unusual, I guess, for personal
 4 injury lawyers, correct?
 5 A That's correct.
 6 Q All right. I don't know if it's -- how often
 7 does -- and the only reason I'm asking is I went through
 8 this stuff and I'm seeing this, what they call a PR log.
 9 A Okay.
 10 Q Whatever it is, okay. And do you have -- I
 11 guess you just what, hire somebody to do your PR?
 12 A That's correct.
 13 Q And does -- do you have a point person who
 14 does it, like one of your lawyers?
 15 A Yes.
 16 Q And who would that be?
 17 A Seth Lehrman.
 18 Q Okay. And do you also use Facebook to promote
 19 the law firm?
 20 A I believe the law firm has a Facebook page,
 21 but I can't say for certain.
 22 Q All right. Do you actually do any of the
 23 input yourself?
 24 A Zero. I never have.
 25 Q Do you have the approval yourself of what's

1 put in there, do you have to approve what's put in there
 2 or it's --
 3 A No.
 4 Q Okay. All of the advertising that is done
 5 about Bradley Edwards then, such as -- I mean, I'm sure
 6 you have seen them showing your face on channel -- I am
 7 talking about the Huizenga thing now where, what's her
 8 name, Buntrock?
 9 A I have never seen it.
 10 Q Okay. All of that's done by someone else?
 11 A Yes.
 12 Q You are -- you are presently involved in
 13 the -- are -- have you filed suit in that case yet?
 14 MR. GOLDBERGER: Identify the case for him.
 15 MR. HADDAD: Pardon?
 16 MR. GOLDBERGER: Just so we have a record.
 17 MR. HADDAD: I will get to it in a second. If
 18 he says he filed suit, I'll do it.
 19 A You -- you're talking about --
 20 BY MR. HADDAD:
 21 Q I'm talking about the pastor --
 22 A I know what you're --
 23 Q -- you know exactly what I'm talking -- first
 24 time I saw --
 25 A Talking about Jeffrey London?

1 Q Yeah, yeah.
 2 A We have filed suit against Jeffrey London
 3 only.
 4 Q Only, no one else has been impleaded?
 5 A That's true.
 6 Q Or joined as defendant, okay. And that's how
 7 many plaintiffs do you have in that case?
 8 A We have one.
 9 Q Okay. And does anyone else have other
 10 plaintiffs?
 11 A No.
 12 Q Okay. And of course, fortuitously, I have to
 13 be in the courtroom on something else when I ran into
 14 you and Matt Weissing there.
 15 A Right, at an Arthur hearing for Jeffrey
 16 London.
 17 Q At an Arthur hearing, correct.
 18 A Right.
 19 Q And at that point, it was mentioned that
 20 Miss Buntrock had funded the church, funded monies and
 21 done other certain things, correct?
 22 A I heard that when you heard that.
 23 Q All right. And how did the plaintiff reach
 24 you in that case, do you know?
 25 MR. KING: I --

1 A Yes, I do know it.
 2 MR. KING: Is this presumably going to
 3 reputation?
 4 MR. HADDAD: Oh, yeah.
 5 A I do know.
 6 MR. HADDAD: No, I'm doing it because I wanted
 7 a cut of the fee, of course.
 8 A It was --
 9 MR. KING: I want to make sure we don't go
 10 afield, that's all.
 11 Go ahead.
 12 A It was through a foster home that Matt
 13 Weissing, my partner, he fostered a child through the
 14 home.
 15 BY MR. HADDAD:
 16 Q Umm-hmm.
 17 A And the foster home where one of the child
 18 victims of Jeffrey London was placed contacted Jeff --
 19 Matt Weissing. That was how it happened.
 20 Q All right. Now, you are not familiar with
 21 your advertising, correct?
 22 A No.
 23 Q Okay. So if it says you are representing
 24 several young men against Jeffrey London, you
 25 wouldn't -- that would not be correct?

1 A I hesitated because you asked how many
2 plaintiffs there are. And for you to be a plaintiff,
3 there has to be a lawsuit.
4 Q How many potential plaintiffs are you
5 representing?
6 A Let me describe what I do in that case and
7 then you can take it from there. There are, I believe,
8 seven or eight victims that we have signed on to
9 represent them through the criminal process as crime
10 victims' rights attorneys. Some -- some may have civil
11 claims that still are viable and some may not. Right
12 now we have filed one. In the future, we may decide to
13 file others. That's the best I can do.
14 I mean, there -- obviously, we are dealing
15 with a lot of issues that relate to abuse that happened
16 many, many years ago, which raises other issues that
17 everybody is probably familiar with so~.~.~.
18 Q All right. Now, in that case, of course,
19 there is, I suppose, some issue of whether or not --
20 well, obviously Mr. London would be what the -- they
21 used to say is an impossibility, judgment-proof,
22 correct? He has got no --
23 A I would hope that the guy goes to prison for
24 the rest of his life so --
25 Q Well, I understand that.

1 A -- that would probably make him
2 judgment-proof.
3 Q Well, I understand that, but the benefactor of
4 that place where he was is far from judgment-proof,
5 correct?
6 A Benefactor of what place?
7 Q Of the -- of the place where he had these
8 kids, would be far from judgment-proof, correct?
9 A The owner of the house I believe is Elizabeth
10 Buntrock.
11 Q All right. And Miss Buntrock is Huizenga's
12 sister or cousin?
13 A Some relative.
14 Q All right. And she was married and had one of
15 the huge -- largest divorces in the history of Broward
16 County, correct, settlements?
17 A I don't know.
18 Q All right. Okay. And --
19 A I'll come to you for that information.
20 Q I'm sorry?
21 A I will come to you for that information.
22 Q You are talking about more people that don't
23 like me.
24 All right. You have advertised, besides your
25 victims' rights stuff, your lawsuits against Epstein,

1 correct?
2 A I believe so.
3 Q And in your various advertisements, you have
4 talked about suing billionaire Jeffrey Epstein,
5 obtaining judgments for victims against billionaire
6 Jeffrey Epstein, correct?
7 A Have I said that?
8 Q Your PR people?
9 A Do you have something that says that, maybe.
10 Q I'm asking you.
11 A It's a true statement, so maybe it is -- maybe
12 it was said.
13 Q I have not yet questioned your integrity about
14 a single thing, Mr. Edwards.
15 A I understand.
16 Q I'm just asking you whether or not it's true.
17 A Yeah, I want to help you out and I think that
18 that --
19 Q Well --
20 A -- was done, but I'm not sure.
21 Q You want to help me out? How can I thank you?
22 A Help me help you.
23 Q You start to look like Tom Cruise if I keep at
24 it.
25 All right, now, you sought -- you made it

1 known that you were seeking victims of Mr. Edwards,
2 correct -- Mr. Epstein; did you not?
3 A Seeking victims?
4 Q Yeah, seeking to represent victims, you put it
5 out whether or not there were any victims that needed
6 representation, for lack of a more professional way of
7 putting it?
8 A I don't think that's right.
9 Q Huh?
10 A I don't think that's right.
11 Q Okay. Now, during the time of these Epstein
12 suits and Epstein cases, you were quoted in the
13 newspapers numerous times, correct?
14 A Yes.
15 Q You were quoted in the Daily Mail, I believe
16 over in London, Mail Online, whatever they call it, I
17 guess the Daily Mail, correct?
18 A I remember the publications but I was quoted
19 in several newspapers.
20 Q All right. And I don't want to go back over
21 what's in your previous depo, so we don't have to go
22 through that, but in a response to a discovery request
23 Mr. Scarola produced a packet, to say the least, of
24 e-mails that you had with various reporters, correct?
25 A I don't know.

1 Q Now I got to work.
 2 A Sorry.
 3 Q That's okay.
 4 (Thereupon, a discussion was had off the
 5 record.)
 6 I'm trying to truncate this because I know
 7 most plaintiff's lawyers and civil lawyers would keep
 8 you here for six hours and probably --
 9 A I feel like we're headed down that road.
 10 Q You're not going to be headed down that road
 11 with me. I am not staying that long. I'm just trying
 12 to find it. See if I was a civil lawyer, I would have
 13 all of this stuff nice and neat. Where is this stuff?
 14 There it is.
 15 There is -- and this is why I am doing this --
 16 is, Dear Miss Coleman, the accompanied -- this is
 17 May 8th, 2012, are -- in producing response to
 18 plaintiff's discovery request, subject to our agreement
 19 that this production does not constitute or support a
 20 waiver of privilege asserted as to any other documents.
 21 A Okay.
 22 Q And there are hundreds of e-mails that
 23 Mr. Scarola produced to Miss Coleman.
 24 (Thereupon, a discussion was had off the
 25 record.)

1 BY MR. HADDAD:
 2 Q Okay.
 3 A I have seen those.
 4 Q Oh, can I see them, because I want to go
 5 through every one of them?
 6 A I can't wait.
 7 Q Well, you're -- if Scarola was here I would do
 8 it just for the hell of it.
 9 A I bet you would.
 10 Q I would.
 11 MR. KING: Thank you.
 12 MR. HADDAD: You're welcome.
 13 BY MR. HADDAD:
 14 Q All right. In looking through these, these
 15 are all e-mails that you sent, correct?
 16 A I think either I sent or received or was
 17 copied on. I mean, I think that there are some --
 18 Q All right. And there is no questions you had
 19 any relationships with the press throughout this entire
 20 proceeding?
 21 A I agree.
 22 Q I mean, most good lawyers do. The press can
 23 be your best friend in cases.
 24 A Right. Yeah, we've got a lot of witnesses
 25 that way, I -- I agree.

1 Q Yeah. And you found a lot of witnesses by
 2 looking for witnesses in sex cases, Farmer, Jaffe?
 3 A We have found witnesses that way too.
 4 Q Okay. And I mean, that is advertising, isn't
 5 it, looking for -- looking for witnesses in sexual abuse
 6 cases?
 7 A Yeah, I --
 8 Q We support crime -- we are looking for Jeffrey
 9 Epstein, child molester, that's you guys wrote that out,
 10 right?
 11 A We got a lot of calls being based on various
 12 things, including the things you -- you are talking
 13 about now, so yeah.
 14 Q And then as recently as -- I don't have the
 15 date, but recently you got -- you're looking for
 16 witnesses for youth pastor, J. London, firm is actively
 17 investigating or representing victims claiming sexual
 18 abuse by former pastor, J. London, click video below.
 19 And then you're looking for our law firm prosecuted
 20 numerous cases against registered sex offender, Jeffrey
 21 Epstein. And then you have big headlines, Jeffrey --
 22 big print, Jeffrey Epstein, registered sex offender,
 23 correct?
 24 A I have never actually seen that but that's --
 25 Q Well, here, let me show that to you.

1 A Where does this come from, the Web site?
 2 Q Your Web site.
 3 (Thereupon, a discussion was had off the
 4 record.)
 5 A Okay. Okay.
 6 Q And from your profile, you realize that you
 7 guys did all that stuff, correct?
 8 A Yeah, I realize that.
 9 Q Looking for witnesses, looking for clients?
 10 A I am holding it right now, so I realize it.
 11 Q Yeah. Let me see, this is Farmer, Jaffe Web
 12 site stuff. Would you agree that this has been
 13 recently -- Farmer, Jaffe, Weissing, attorney Brad
 14 Edwards pursued victims' rights cases on behalf of 10
 15 women who were -- and it gives between 12 and 15 years
 16 of age -- were sexually molested and abused by Palm
 17 Beach resident, Jeffrey Epstein. Epstein, now a
 18 registered sex offender and his -- what is that, Edwards
 19 proved that Epstein, now a registered sex -- pedophile
 20 in its international sex trafficking criminal enterprise
 21 exploited them and hundreds of under-age girls, correct?
 22 A What's your question?
 23 MR. KING: Form.
 24 BY MR. HADDAD:
 25 Q Is that -- is that -- is that what your firm

1 put out?
 2 A I don't know, I haven't seen that. You are
 3 pulling it from our firm Web site. I told you I haven't
 4 input anything, so the fact that it's here, it seems
 5 like it's here.
 6 Q Well, I --
 7 A You are reading it, right?
 8 Q I want to ask you questions. I am reading it
 9 right?
 10 A It seems that way.
 11 Q Okay. You have never seen that?
 12 A No.
 13 Q So your firm is putting these things out and
 14 they do it without your knowledge or with your
 15 knowledge?
 16 A They know about my cases so~.~.~.
 17 Q I understand that. I'm just asking you if you
 18 are consulted about the content of what your firm IT guy
 19 or whoever it is puts out, that's all I'm asking, not a
 20 hard question.
 21 A I was not consulted. Here's the thing, has
 22 there ever been a conversation where the PR person has
 23 asked me the truthfulness of this information and me say
 24 yes, that possibly happened. Have I known that this was
 25 on our Web site, no. I don't have a problem with it

1 in London papers regarding Jeffrey Epstein?
 2 A Right now, as I sit here right now, no, I
 3 don't remember ever seeing this or knowing this.
 4 Q Okay. And did you ever express to your law
 5 firm that you are so afraid of Jeffrey Epstein not to go
 6 do things like this because you might get him mad?
 7 A No, the opposite. I mean, I think that being
 8 public is what saves me so~.~.~.
 9 Q Okay.
 10 A I don't --
 11 Q So the more public you are, such as -- well,
 12 let me ask you this.
 13 A If something happened to me right now, I think
 14 that everybody will know he did it, so I think that
 15 helps.
 16 Q Have you ever been married?
 17 A Yeah.
 18 Q If something happened to --
 19 A Not as many times as you.
 20 Q And -- I'm just looking at this. How did you
 21 get \$735,000 for three toes?
 22 A Three toes were chopped off and there was a
 23 little more to it but~.~.~.
 24 Q Oh, I guess so, that's a lot of money.
 25 Okay. Now, the input that you have, I read

1 being there but I -- my role in the firm is just not
 2 inputter of information on a Web site.
 3 Q All right. Now, Mr. Edwards is currently
 4 pursuing a precedent-setting case on behalf of young
 5 girls who were sexually molested by a well-connected
 6 billionaire. Is that the same case or a different case
 7 against Mr. Edwards?
 8 A Sounds like the Crime Victim Rights Act case
 9 that we discussed earlier.
 10 Q All right. And that would still be against
 11 this gentleman, correct, Mr. Epstein?
 12 A It's actually against the U.S. Attorney's
 13 Office.
 14 Q All right. Well, it says here, on behalf of
 15 young girls -- okay, well -- and it says WPTB, news
 16 coverage, WPBF. Does that mean your groups send these
 17 out to the different radio stations or TV stations?
 18 A I don't know what it means. I doubt that
 19 that's what it means though, but I don't know what --
 20 Q I don't know, I'm just asking --
 21 A I don't know.
 22 Q -- how PR works, I thought maybe you did.
 23 A I don't.
 24 Q Okay. Were you familiar with your law firm
 25 putting out that kind of publicity that you were quoted

1 somebody's book. Who's Michael Isikoff?
 2 A I don't know.
 3 Q You don't know who it is?
 4 A (Witness shakes head.) The name doesn't sound
 5 familiar to me.
 6 Q Okay. And you don't recall e-mails with him,
 7 such as --
 8 A I don't remem -- I don't know -- or recognize
 9 the name.
 10 Q All right. A gentleman from Newsweek
 11 magazine. You don't remember?
 12 A I feel like I talked to so many people, I
 13 don't -- I don't really remember that name particularly.
 14 If you show me something, I -- you know, if it says I
 15 sent an e-mail or received an e-mail, then I'm not going
 16 to quarrel with it. I -- that name does not sound
 17 familiar.
 18 Q How about Michele Dargan?
 19 A Yes, I know Michele.
 20 Q And who is she?
 21 A She works with the Palm Beach Daily News.
 22 Q Okay. And how about some Cochalla lady,
 23 Cochaca, what -- how do you say it, do you know who I
 24 mean?
 25 A Also at the Palm Beach Daily News?

1 Q I don't know, I'm just asking you. It's a
2 lady that you guys were talking about when they picked
3 up, what's his name, Polanski, you guys thought about
4 maybe using the Polanski case to help rake -- gear up
5 some things, you had a series of e-mails. Do you recall
6 that?

7 A I don't remember that either.

8 Q You don't, okay. You don't remember anything
9 about anything about -- any com -- communications,
10 Polanski got arrested, what, two years ago? They --

11 A I don't remember either.

12 Q -- picked him up in Switzerland and then they
13 had to let him go?

14 A I don't remember any correspondence about --

15 Q Conchita?

16 A Conchita, yeah, I know --

17 Q Who is she?

18 A A reporter somewhere up north.

19 Q Okay. And do you know how many e-mails you
20 may have exchanged with her?

21 A No.

22 Q Do you know how many telephones calls you had
23 with her?

24 A No. I have had telephone calls. I have had
25 e-mails.

1 Q All right. Did you ever give Michele the
2 phone number for Epstein's probation officer down in
3 Virgin Islands or anything?

4 A I don't remember doing that, but I might have.

5 Q All right. And do you recall giving them
6 information about where to find Mr. Epstein at various
7 times to different reporters and what you were able to
8 find out about him?

9 A Specifically, what? There is certain
10 information I may have given. I -- I was -- I use my
11 discretion I think pretty responsibly to get the
12 information that I needed while also disseminating only
13 the information that I thought would ultimately be
14 helpful.

15 Q To whom?

16 A To whatever reporters that we're talking
17 about.

18 Q Oh, and --

19 A If we are talking about Michele Dargan, then
20 to Michele Dargan.

21 Q It would be fair to say that your methods
22 of -- excuse me, let me back that up.

23 As a trial lawyer, you recognize that the
24 press can be invaluable among jurors, correct?

25 A I agree.

1 Q And one of the ways a lawyer can sway, as it
2 were, public opinion to his case is to have an informed
3 public from which he would be near his children,
4 correct?

5 A I don't know.

6 Q Well, you give -- you don't give newspaper
7 reporters information because you like them, you do it
8 because want something put out in the public.

9 A I do it because I want information back in
10 return.

11 Q Okay. But also --

12 A It's -- you give to get.

13 Q I am not going to be argumentative with you,
14 but having stuff in the paper about Epstein serves your
15 benefit to try to get cases settled, doesn't it?

16 A It serves my benefit to get witnesses to call
17 and to --

18 Q Umm-hmm.

19 A -- retrieve other information that would help
20 me prove the cases against him, and in the end if
21 proving the case against him is going to cause a
22 settlement, then indirectly I guess your statement was
23 true.

24 Q And suggesting with Conchita or whatever her
25 name is, that perhaps the arrest of, I forgot his name

1 already.

2 MS. HADDAD COLEMAN: Roman Polanski.

3 MR. HADDAD: Huh?

4 BY MR. HADDAD:

5 Q Roman Polanski might be an impetus to get
6 together a bunch of mothers to protest Jeff Epstein,
7 that would help your benefit?

8 A I don't remember that.

9 Q Okay. Just asking the questions.

10 A If you can show me something, I will help you
11 out.

12 Q I don't need to be helped out, I'm just asking
13 if you remember right now. I know how to help myself,
14 thank you.

15 Okay. And that was 2009. Hm. You don't
16 remember Conchita asking you maybe to create a video
17 against men in power?

18 A No.

19 Q I found it amusing.

20 A I find it amusing as well.

21 Q But it's amazing they pick you as the
22 forepoint?

23 A It is? Why? Is that a shot at me?

24 Q I would never take a shot at you.

25 A I felt that.

1 Q I am too professional for that.
 2 A That is a shot at yourself.
 3 Q That's something no one would ever say about
 4 me, so I figured I would do it.
 5 A Uh, I don't remember that e-mail, but I, like
 6 you, find it somewhat amusing. I mean, you see me
 7 saying I -- the cases seem so different, not factually
 8 but procedurally, or I'm unsure as to how we can use one
 9 to help in the other, so I mean, that's my answer --
 10 Q But -- but I --
 11 A -- I agree with today.
 12 Q I understand that's your answer, but what we
 13 are talking about is there is a -- a -- it is a --
 14 almost a circle of people involved in this case
 15 involving you, the press and others. I mean, there is
 16 hundreds of e-mails there.
 17 A More people in this case --
 18 MR. KING: Objection, form.
 19 A -- than any other case I have ever had.
 20 MR. KING: Objection to form.
 21 BY MR. HADDAD:
 22 Q All right. And that's involved with members
 23 of the public also?
 24 A I think that you could say that no matter what
 25 category we are talking about, just a lot of people.

1 that's the date, correct?
 2 A Yes, I would assume so too.
 3 Q Now, are you aware or did you participate or
 4 have any involvement in the plea or the sentencing of
 5 Alfredo Rodriguez?
 6 A No.
 7 MR. KING: Let me interpose an objection. No?
 8 A The answer is no. I'm just wondering if, you
 9 know, that's -- I remember reading my deposition last
 10 time and we discussed what of these matters is relevant
 11 and et cetera. But the answer is no.
 12 BY MR. HADDAD:
 13 Q All right. Let -- well, let's -- what it
 14 boils down to, nobody called up any of the objections
 15 that were raised. And I'm not going go through the
 16 whole deposition.
 17 A Yeah.
 18 Q I assume you read your deposition in the last
 19 couple of days, did you not?
 20 A I did.
 21 Q All right. And I'm sure your counsel read it
 22 and Mr. Scarola has innumerable objections.
 23 A Right.
 24 Q Actually, one or two were meritorious, but he
 25 had innumerable objections on economic privilege, on

1 Q Did you ever meet Conchita face-to-face?
 2 A I did.
 3 Q Where?
 4 A In the Palm Beach Courthouse.
 5 Q Okay. State Courthouse?
 6 A Yeah.
 7 Q Okay. On one of the Epstein cases?
 8 A She approached me telling me that she had
 9 known him for 20 years, coming -- I was coming out of
 10 the courtroom. And I think that I was at a hearing on
 11 an Ep -- on a case against Jeffrey Epstein.
 12 Q All right. And -- okay, can I see that back
 13 for a second? There was something else I wanted to see
 14 and let me just give -- if you don't mind giving me one
 15 second.
 16 Are you familiar with a 2010 case. Your
 17 deposition was in March of 2010, correct?
 18 A That's what you told me previously. You told
 19 me February and then I think you corrected it to March.
 20 Q Yeah, I corrected myself.
 21 A But you are right.
 22 Q Okay. I am showing you a copy.
 23 A March 23rd, 2010.
 24 Q I am not sophisticated enough to change the
 25 date on the front page of a deposition so I assume

1 other things, correct? If I were to ask you each of
 2 those questions --
 3 A The same objection.
 4 Q -- they would be the same objections, your
 5 counsel would make the same objections, that way I don't
 6 have to redo for two and a half hours.
 7 MR. KING: That's correct.
 8 BY MR. HADDAD:
 9 Q So I get in front of the judge and --
 10 A Fair enough.
 11 Q -- were you the confidential informant in
 12 Alfredo Rodriguez, confidential witness?
 13 MR. KING: The same objection. I'm going to
 14 object and instruct him not to answer.
 15 MR. HADDAD: Okay. Thank you.
 16 BY MR. HADDAD:
 17 Q Did you contact -- did you have any contact
 18 with any persons who were listed in the book that was
 19 eventually produced by Mr. Rodriguez after he got
 20 arrested and the book was made public?
 21 MR. KING: Let me object. I don't see the
 22 relevancy, immaterial.
 23 MR. HADDAD: Oh, because he's getting more
 24 clients and it goes to reputation as to whether
 25 they hired him or not based on his contact.

1 MR. KING: Was the book published by somebody
2 else?

3 MR. HADDAD: No, he -- I am asking the
4 questions, I don't know. I didn't hear what you
5 said, I'm sorry, Jack, what was that?

6 MR. KING: That's all right. I said as to a
7 book published by somebody else.

8 MR. HADDAD: No, no, no, no. What happened in
9 this, I am sure you are not familiar, is Alfredo
10 Rodriguez was his -- was his house manager.

11 MR. KING: Right.

12 MR. HADDAD: He gave a deposition in the case.
13 Brad was there, I believe, and a bunch of other
14 lawyers that were suing Mr. Epstein.

15 MR. KING: Right.

16 MR. HADDAD: After that deposition,
17 Mr. Rodriguez approached an individual and said, I
18 have a book that contains a lot more than what I
19 said at my deposition. In essence, I withheld tons
20 of stuff at my deposition, I want 50 G's. The
21 person he approached, I assume, is Mr. Edwards.
22 Mr. Edwards, being the lawyer that he is didn't get
23 the book, he approached the police and said someone
24 is trying to commit a crime, and the book -- the
25 gentleman was arrested through a roundabout

1 different sort of thing. And then I assume the
2 book was made public and the names were produced
3 and I wanted to know whether or not Mr. --

4 MR. KING: That book?

5 MR. HADDAD: That book. Whether or not
6 Mr. Edwards had contact with any persons that were
7 listed in that book.

8 MR. KING: Well, along the lines that were
9 taken last time with regard to whatever work he
10 undertook, whatever work product was involved in
11 the investigation of his cases, in light of the
12 current status of the case, in which the -- you
13 know, pending claim is what it is --

14 MR. HADDAD: Umm-hmm.

15 MR. KING: -- I think it's -- it's even more
16 reinforced those objections are and will be raised.

17 MR. HADDAD: All right. That's fine, I
18 just -- to let you object.

19 BY MR. HADDAD:

20 Q The reason I'm asking the question is, did you
21 initiate or attempt to initiate any new lawsuits based
22 upon what you learned in there?

23 MR. KING: The same objection. Instruct him
24 not to answer.

25 MR. HADDAD: That's not going into work

1 product, it's --

2 MR. KING: No, it is.

3 MR. HADDAD: I'm not -- I'm not going to argue
4 with you here today.

5 MR. KING: It goes to his mental process.

6 MR. HADDAD: You raise your objections.

7 That's fine, Mr. King.

8 BY MR. HADDAD:

9 Q And I take it you won't answer the question as
10 to whether or not you were a confidential witness?

11 MR. KING: The same objection.

12 MR. HADDAD: Thank you. All right. Since a
13 ton of this is --

14 MS. HADDAD COLEMAN: Can you hand me those
15 pleadings so I can mark them as exhibits.

16 MR. HADDAD: Oh, it's this?

17 BY MR. HADDAD:

18 Q Did you attend Mr. Rodriguez' sentencing?

19 A No.

20 Q Did you have any contact with Mr. Rodriguez
21 after his sentencing?

22 MR. KING: Objection. The same instruction.

23 MR. HADDAD: Okay.

24 BY MR. HADDAD:

25 Q Did you have any contact with Mr. Rodriguez'

1 subsequent employer, Sid Goldman?

2 MR. KING: The same objection, all based on
3 work product.

4 MR. HADDAD: I need a five-minute --
5 two-minute break.

6 MR. KING: Okay.

7 MR. HADDAD: All right. Or do you want to
8 break for lunch?

9 THE WITNESS: How long are you going to be? I
10 mean, I don't know.

11 MR. HADDAD: I'm not sure. I mean, I've got
12 two other lawyers that have to decide how long I'm
13 going to be. That's why I'm asking for a
14 two-minute -- five-minute break.

15 THE WITNESS: Take it, and then let's figure
16 out how long we are going to be and if we need to
17 take a lunch, we will, and if not then -- you know,
18 if you have another hour, then I will sit here and
19 we'll take a lunch later.

20 MR. GOLDBERGER: Let's say --

21 MR. HADDAD: You don't call the shots, I do.

22 MR. KING: Do you want to take two minutes,
23 Fred?

24 THE VIDEOGRAPHER: The time is 11:58 a.m. We
25 are now coming off the video record.

1 (Whereupon, a break was taken.)

2 (Thereupon, Defendant's Exhibit Nos. 1 - 11
3 and 13 & 14 were marked for identification.)

4 THE VIDEOGRAPHER: The time is 12:08 p.m. We
5 are now back on the video record.

6 MR. KING: And just -- just before -- before
7 we go on, I understand that you all have marked
8 various exhibits that were referenced during the
9 course of the testimony which hadn't been marked
10 earlier which you now marked 1 through what?

11 MS. HADDAD COLEMAN: 1 through 11, and they
12 were shown to coun -- to Mr. Edwards during the
13 course of this deposition.

14 MR. KING: Very good.

15 MS. HADDAD COLEMAN: And not contemporaneously
16 re-referenced.

17 MR. KING: Very good.

18 THE WITNESS: It's -- it's a little bit more
19 than that, 1 through 11 and then 13 and 14. 12 was
20 taken out of there so-- --.

21 MS. HADDAD COLEMAN: Okay.

22 MR. KING: So just let's put on the record
23 what we have then so the record is clear.

24 THE WITNESS: Okay. Exhibit 1 was part of
25 Farmer, Jaffe, Weissing Web site. Exhibit 2 is

1 from the Web site. Exhibit 3 from the Web site,
2 Exhibit 4 from the Web site. Exhibit 5 from
3 National Trial Lawyers Web site. Exhibit 6 from
4 AVVO, A-V-V-O. Exhibit 7 from the Farmer, Jaffe,
5 Weissing Web site. Exhibit 8 from lawyers.com.
6 Exhibit 9 from for 40 under 40. Exhibits 10 and 11
7 are interrogatories directed to me and responses.
8 Exhibit 13 is the transcript of the sentencing
9 proceedings for Alfredo Rodriguez. Exhibit 14 is a
10 plea agreement between the United States and
11 Alfredo Rodriguez.

12 BY MR. HADDAD:

13 Q Let me go back, if I may, just for a minute to
14 the plea agreement so your counsel can object. Did
15 you -- did you have any input -- did you ever read the
16 plea agreement, particularly the factual presentation on
17 Page 4 and 5, I believe it is?

18 A I think the answer is no, but let me see if
19 this refreshes my recollection, hold on. What, Page 4
20 and 5?

21 Q I think whatever the factual basis is where it
22 talks about Rodriguez approaching someone about what
23 information he had.

24 A I don't think I have ever read this.

25 Q And -- and going back to that just as an

1 aside, did you -- get -- get ready -- did you ever have
2 any contact with Kendall Coffey regarding the propriety
3 or ask him for an opinion of the propriety of taking
4 that book from Mr. Rodriguez?

5 MR. KING: The same objections, work product.

6 BY MR. HADDAD:

7 Q Okay.

8 A And attorney-client privilege.

9 MR. KING: And Government privilege.

10 MR. HADDAD: And what?

11 MR. KING: Government privilege.

12 MR. HADDAD: Kendall Coffey, neah, he was
13 already out.

14 MR. KING: He was already out by then, okay.

15 MR. HADDAD: Yeah, that was after he -- oh, I
16 shouldn't --

17 MR. KING: No, don't say that.

18 MR. HADDAD: I don't -- why --

19 MR. KING: I know what you're talking about.

20 MR. HADDAD: -- I don't like him.

21 MR. KING: You must have dealt with him while
22 he was there.

23 MR. HADDAD: Please. I am dealing with him
24 still.
25

1 BY MR. HADDAD:

2 Q All right, Brad, let me ask, do you have any
3 contact these days with Critton's firm?

4 A No.

5 Q Okay. Not recently, not -- not -- okay.

6 Also you asked for some release of the
7 confidentiality agreements, didn't you, for purpose of
8 obtain -- ascertaining money?

9 MR. KING: Hold on a second.

10 A I don't think so.

11 MR. GOLDBERGER: In the discovery.

12 MR. KING: In the what?

13 MR. GOLDBERGER: In the discovery.

14 MR. HADDAD: In the discovery.

15 MR. KING: Okay.

16 A I don't know.

17 BY MR. HADDAD:

18 Q Okay. Have you ever discussed with
19 Mr. Scarola?

20 A Really, that's how you are going to start your
21 question?

22 Q Oh, yeah, yeah, yeah, yeah. Any of the
23 confidentiality agreements or anything that was obtained
24 in the confidentiality agreements?

25 MR. KING: Objection.

1 A Attorney-client privilege.
 2 BY MR. HADDAD:
 3 Q Okay. I just -- I just ask the questions,
 4 that's all. You can always say no.
 5 A I've just never heard of an attorney
 6 actually --
 7 Q You -- you -- well, I --
 8 A -- ask it that way.
 9 Q -- well, let me put it this -- you were aware
 10 that Mr. Scarola's law firm represented other purported
 11 victims of Mr. Epstein, correct?
 12 A I was aware that his law firm represented
 13 victims of Mr. Epstein, yes.
 14 Q And how many?
 15 A How many victims?
 16 Q Yeah.
 17 A I'm not sure.
 18 Q All right. And do you know which lawyers?
 19 A I believe that Jack was one of them. I know
 20 Jack was one of them. He was the main lawyer that
 21 handled the cases over there.
 22 Q Okay.
 23 A In fact, I don't remember the name of any of
 24 the other lawyers from the firm that handled the cases.
 25 Q All right.

1 if they were made again today.
 2 MR. HADDAD: Yeah, he said that already.
 3 A I want to make a clean record too. If you had
 4 asked the same questions, I would have asserted at least
 5 the same objections.
 6 BY MR. HADDAD:
 7 Q If not more.
 8 A If not more, correct.
 9 Q You have read them and thought about it and
 10 you are --
 11 A Right.
 12 Q -- much more acquainted now that you are in
 13 the Best Lawyers in America and all that other stuff,
 14 you have better objections than the old guys.
 15 A I have better objections.
 16 Q You are much -- you are much better than the
 17 old people.
 18 MR. KING: But he's not usurping our role
 19 entirely with regard those objections.
 20 MR. GOLDBERGER: Okay. We're good.
 21 MR. HADDAD: I'm just a poor lawyer who
 22 doesn't have all these PR people and all of this
 23 great stuff going on.
 24 MS. HADDAD COLEMAN: Everyone understands this
 25 deposition will be continued after the Court rules

1 MR. HADDAD: I don't think I have any other
 2 questions. Does anybody have anything they want
 3 to -- Debbie?
 4 MR. KING: As I understand it, what -- well,
 5 go ahead, I didn't mean to cut you off.
 6 MR. HADDAD: That's okay.
 7 BY MR. HADDAD:
 8 Q As you know, we still have -- as you said you
 9 would not answer any of the questions that were
 10 propounded to you before and objected to.
 11 A My objection to those previous questions would
 12 be my objection today.
 13 MR. HADDAD: All right. It was set for a
 14 hearing April 12th of 2011 and then again reset for
 15 another time and no one ever went -- the hearing
 16 never went forward, so those questions are still
 17 objected to, unresolved. So we'll stop. We will
 18 go from there, see whatever happens.
 19 THE WITNESS: Okay.
 20 MR. GOLDBERGER: Well, wait a minute. Just
 21 one thing. I just want to make sure we have a
 22 clean record here. So if we had asked the same
 23 questions, he would have raised the same
 24 objections, so not only are we going to raise the
 25 previous objections, we are going to raise them as

1 on everything.
 2 THE WITNESS: Everybody understands the Court
 3 is going to rule on things and order me back to a
 4 deposition or not order me back to a deposition,
 5 whatever the Court's going to do.
 6 MS. HADDAD COLEMAN: I don't want another
 7 nasty letter from Mr. Scarola, so I just wanted to
 8 be clear that we may --
 9 MR. HADDAD: Why, that -- that's his purpose
 10 in life. Will you relax.
 11 MS. HADDAD COLEMAN: But I just want it clear
 12 on the record.
 13 MR. HADDAD: That's what happens when you get
 14 old.
 15 MR. KING: From our -- from our perspective,
 16 you understand we were not producing records here
 17 today, the financial records, because we were
 18 asserting the financial privacy privilege?
 19 MS. HADDAD COLEMAN: Of course.
 20 MR. KING: So I gather that that would have
 21 put you in a position where you would not have been
 22 able to, nor would you have proceed with questions
 23 today.
 24 MR. HADDAD: We wouldn't even -- no, as long
 25 as it's pending before the Court, I saw no purpose

1 in having to reestablish that you were objecting
 2 and, you know --
 3 MR. GOLDBERGER: Obviously, if those records
 4 had been produced, we would have had a ton of
 5 questions about that but--~.~.
 6 MR. KING: I understand, but my only concern
 7 was I didn't know, because I was not there at the
 8 hearing, I didn't participate in any way with
 9 respect to that, so I don't know what the Court's
 10 expectations were as to whether or not the Court
 11 wanted you to ask any questions. If you don't
 12 proceed, that's the case.
 13 MR. HADDAD: No, I don't think it was
 14 necessary --
 15 MS. HADDAD COLEMAN: In his order, the Court
 16 permitted the deposition to go forward. I said at
 17 the hearing we wouldn't get into any questions that
 18 were directly related to those documents, with the
 19 express understanding once the Court rules we may
 20 ask whatever the Court permits us to ask.
 21 MR. KING: That's what I needed to know.
 22 Thank you. All right.
 23 MR. HADDAD: All right. We're -- do you
 24 want -- do you want to read or waive this part of
 25 it?

1
 2 STATE OF FLORIDA
 BROWARD COUNTY
 3
 4 SUBSCRIBED AND SWORN to before me this
 day of _____, 2013 at Broward County,
 Florida.
 5
 6 _____
 Notary Public, State of Florida at Large
 7
 8 Commission No:
 9 My Commission Expires:
 10
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1 THE WITNESS: I will read it.
 2 MR. GOLDBERGER: Okay.
 3 THE VIDEOGRAPHER: The time is 12:16 p.m. We
 4 are now coming off the video record. This is the
 5 end of Tape No. 2.
 6 THE COURT REPORTER: Do you want this typed
 7 up?
 8 MR. HADDAD: Do I want it typed up? I'd
 9 like -- you got to make money. I represent the
 10 richest guy in America.
 11 THE VIDEOGRAPHER: Counsel, copy of the video?
 12 MR. HADDAD: Huh?
 13 THE VIDEOGRAPHER: Do you want a copy of the
 14 video, sir?
 15 MR. HADDAD: Sir? No. I don't know. Do we
 16 want a copy of the video?
 17 THE COURT REPORTER: Do you want a copy of
 18 this?
 19 MR. KING: Yes, please.
 20 (Witness excused.)
 21 (Deposition was adjourned at 12:16 p.m.)
 22 AND FURTHER DEPONENT SAITH NOT
 23
 24
 25 _____
 SIGNATURE OF WITNESS

CERTIFICATE OF OATH
 STATE OF FLORIDA
 COUNTY OF BROWARD
 I, the undersigned authority, certify that BRADLEY
 EDWARDS personally appeared before me and was duly sworn
 on the 15th day of May, 2013.
 Witness my hand and official seal this 24th day of
 May, 2013.

 Wendy Roberts
 Registered Professional Reporter
 Notary Public, State of Florida at Large
 Commission No.: EE178268
 My commission expires: March 29, 2016



CERTIFICATE

STATE OF FLORIDA,)
COUNTY OF BROWARD.)

I, WENDY ROBERTS, Registered Professional Reporter and Notary Public in and for the State of Florida at Large, do hereby certify that the foregoing testimony was taken before me; that the witness was duly sworn by me; and that the foregoing pages constitute a true record of the testimony given by said witness.

I further certify that I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, nor financially interested in the action.

Under penalties of perjury, I declare that I have read the foregoing certificate and that the facts stated herein are true.

Signed this 24th day of May, 2013.

[Signature]
WENDY ROBERTS, Registered Professional Reporter

DEPOSITION ERRATA SHEET

Our Assignment No. 10402
Case Caption: JEFFREY EPSTEIN
vs. SCOTT ROTHSTEIN

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the ___ day of ___, 2013.

BRADLEY EDWARDS

EMPIRE LEGAL SUPPORT, INC.
401 EAST LAS OLAS BOULEVARD, STE 1400
FORT LAUDERDALE, FL 33301

To: BRADLEY EDWARDS, ESQUIRE
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301

Re: CASE NO.: 502009CA040800XXXXMBAG

Dear BRADLEY EDWARDS,

Your deposition taken in the above entitled cause is now ready for signature. Please come to this office and sign same; or if you wish to waive the signing of the deposition, please so advise.

If this deposition has not been signed within 30 days of today's date, May 24th, 2013, we shall consider your signature waived.

Your prompt attention in this matter is appreciated.

Sincerely,
[Signature]
Wendy Roberts, RPR

DEPOSITION ERRATA SHEET

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SIGNATURE: _____ DATE: _____

BRADLEY EDWARDS

27 (Pages 105 to 108)

EMPIRE LEGAL SUPPORT, INC.
(954) 241-1010

Electronically signed by Wendy Roberts
Electronically signed by Wendy Roberts
Electronically signed by Wendy Roberts

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BRADLEY EDWARDS

