

IN THE CIRCUIT COURT OF THE 15<sup>TH</sup> JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,

CASE NO. 502009CA040800XXXXMBAG

Plaintiff,

vs.

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

Defendant(s).

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**NOTICE OF DOCUMENT REGARDING WORK PRODUCT CLAIM**

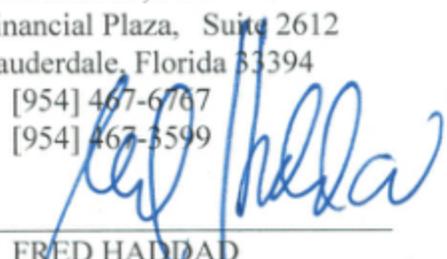
COMES NOW Jeffrey Epstein, through the undersigned counsel, and files the attached document, that is the Statement of Undisputed Facts submitted by Edwards and his counsel and would suggest it weighs upon any “work product” argument, as such is be made vis a vis the Motion to Disqualify the undersigned, and the undersigned would state as follows:

1. Edwards, in support of, apparently, his Motion for Summary Judgment and to “facilitate Epstein’s required compliance with Fla.R.Cr.P. 1.150(c)” [see page 1 of the attached document], filed a forty two (42) page document that details Edwards and, ipso facto, his firm’s involvement in the cases which were civilly prosecuted against Epstein that are the basis of the current litigation.
3. That document details each claim that Epstein made against Edwards and details that which Edwards asserts is his good faith basis for each action taken in the prosecution of his clients claims against Epstein in the underlying litigation. These assertions clearly set forth Edwards [and his firm’s] thought process, and reasons for each action. What is set forth in the “Statement” is in fact what he now asserts is his work product.
4. There is, in fact, no work product; Edwards presented everything but the proverbial kitchen sink in this pleading, and in fact provides more in discovery in this document than could any deposition [compare paragraphs 52-59, and then 62 et seq.].

5. The undersigned will address this in greater detail in a further memorandum, but the document should be considered in conjunction with the evidence and testimony already presented, as well as with the anticipated testimony of Mr. Adler.

I HEREBY CERTIFY that a copy of the foregoing was furnished via Email to all counsel listed below, this 14<sup>TH</sup> day of November, 2012.

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