

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

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXMB AG

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**SUBPOENA FOR DEPOSITION DUCES TECUM**

THE STATE OF FLORIDA:

TO: [REDACTED]

Daily Beast  
c/o Newsweek  
7 Hanover Square  
NY, NY 10004

**YOU ARE COMMANDED** to appear before a person authorized by law to take depositions at the law offices of Fowler White Burnett, P.A., One Financial Plaza, 100 S.E. 3<sup>rd</sup> Avenue, 21<sup>st</sup> Floor, Fort Lauderdale, FL 33394 on the **22nd day of May, 2011, at 9:00 a.m.**, for the taking of your deposition in this action and to have with you at that time and place the following:

***See Attached Schedule "A"***

If you fail to appear, you may be in contempt of court.

You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

Dated on \_\_\_\_\_, 2011.

For the Court

By: \_\_\_\_\_

Joseph L. Ackerman, Jr., Esq.  
Lilly Ann Sanchez, Esq.

Joseph L. Ackerman, Jr., Esq.  
Lilly Ann Sanchez, Esq.  
Fowler White & Burnett, P.A.  
*Attorneys for Plaintiff, Jeffrey Epstein*  
Espirto Santo Plaza  
1395 Brickell Avenue, 14<sup>th</sup> Floor  
Miami, FL 33131  
Telephone: (305) 789-9200

Facsimile: (305) 789-9201

[DON'T WE NEED A DEFINITIONS SECTION AND GENERAL INSTRUCTIONS ON WHAT IS COVERED?]

SCHEDULE "A"

1. Any and all documents reflecting written communications between you and Bradley Edwards regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. [DO NOT LIMIT TO LITIGATION; WHAT ABOUT CLAIMS, INVESTIGATIONS, INCIDENTS OF ALLEGED MISCONDUCT, SURVEILLANCE . . . LET'S MAKE THIS AS EXHAUSTIVE AS POSSIBLE. ALSO YOU ARE LIMITING TO PENDING OR CONTEMPLATED, BUT MAY BE ABOUT LITIGATION THAT WAS ALREADY SETTLED.]

[THIS FOREGOING COMMENT APPLIES TO EACH OF THE REQUESTS BELOW]

4.2. Any and all documents reflecting written communications between you and any employee, independent contractor, investigator, attorney, partner, shareholder —and/or other representative attorney of Rothstein Rosenfeldt Adler, P.A., including, without limitation, Cara Holmes, William Berger, Russell Adler, Mike Fisten, Ken Jenne, Wayne Black, Pat Diaz and Pat Roberts, [CHECK CORRECT SPELLING OF ALL NAMES PLEASE] regarding Jeffrey Epstein including but not limited to any pending and/or any contemplated litigation against Jeffrey Epstein. see comment above.

[SAME REQUEST REGARDING PAUL CASSELL. HOW ABOUT JAY HOWELL?, WHAT ABOUT OTHER ATTORNEYS, SCAROLA, KUVIN, GARCIA AND OTHERS WE LINK TO RRA THROUGH THE PRIVILEGE LOG?]

2.3. Any and all documents reflecting written communications between you and AJ Discala regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. see comment above

3.4. Any and all documents reflecting written communications between you and any employee, attorney, and/or other representative of —the United States Attorneys Office regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. see comment above

4.5. Any and all written documents reflecting communications between you and any employee, agent and/or other representative of the Federal Bureau of Investigations regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. see comment above

5. — Any and all documents reflecting written communications between you and any employee, attorney, and/or other representative the Florida State Attorneys Office regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. see comment above.

6. \_\_\_\_\_

6. — Any and all documents reflecting written communications between you and any officer, detective, and/or other representative of the Palm Beach Police Department — regarding Jeffrey Epstein including but not limited to any pending and/or contemplated litigation against Jeffrey Epstein. see comment above

7. \_\_\_\_\_

8. \_\_\_\_\_ [SAME REQUEST REGARDING ALFREDO RODRIGUEZ]

9. [WE SHOULDN'T LIMIT THIS TO DOCUMENTS REFLECTING COMMUNICATIONS, WHAT ABOUT GENERALLY DOCUMENTS REGARDING JE, CLAIMS, LITIGATION, ACTS, INVESTIGATIONS, ETC.; SHOULD WE ALSO ASK FOR HER NOTES AND ANY RECORDINGS, ETC. IN WHATEVER FORM. WHY NOT BE MORE EXPANSIVE, UNLESS YOU HAVE SOME CONCERN ABOUT THE ENTIRE SUBPOENA BEING INVALIDATED BECAUSE OF APPEARANCE OF BEING OVERBOARD - IF THERE IS A CONCERN LET'S CIRCULATE TO THE GROUP]