

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

**AMENDED MOTION TO STAY PROCEEDINGS PENDING
COMPLETION OF ADDITIONAL DISCOVERY
(AMENDMENTS TO PARAGRAPHS 3 AND 4)**

Counter-Plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an order staying further proceedings with respect to JEFFREY EPSTEIN'S Motion for Attorney's Fees and Costs, and in support thereof would show:

1. EPSTEIN seeks to recover fees and costs against BRADLEY EDWARDS pursuant to a Proposal for Settlement that offered a payment of \$300,000 to BRADLEY EDWARDS in exchange for a dismissal and release of EDWARDS' claims for compensatory and punitive damages against EPSTEIN and EDWARDS' acceptance of a prohibition on EDWARDS, his attorneys, and agents "that they shall not in any method or manner discuss, publish, or disseminate any information concerning the settlement..." The confidentiality clause sought to be imposed by EPSTEIN on EDWARDS, his attorneys and agents also broadly sought to prohibit disclosure of "the reasons for the payment."

2. As EPSTEIN has correctly observed, “EDWARDS proffered two arguments to support his assertion that EPSTEIN’S Proposal was invalid: to wit: “[t]he Proposal is invalid because EPSTEIN failed to explain material terms of the confidentiality clause, and its implications; and EPSTEIN cannot prove he has beaten or even equaled his Proposal.” EDWARDS’ Opposition pp. 5-6 as quoted in EPSTEIN’S Memorandum of Law Regarding Ethical Issues...at pg. 2.

3. At the hearing on this matter on December 6, 2014, EDWARDS’ counsel focused attention on one of the troubling “implications” of EPSTEIN’S confidentiality prohibition—the restriction imposed on EDWARDS’ ability to communicate all of the details of his settlement with EPSTEIN to multiple clients on whose behalf he was actively litigating a Federal Crime Victims Rights Act proceeding directly challenging the validity of EPSTEIN’S deal with federal prosecutors which, if successful, has the potential of subjecting both EPSTEIN and his associates to multiple federal felony charges. The Court ordered supplemental briefing on this issue which remains uncompleted.

4. The other primary argument presented on EDWARDS’ behalf related to the unestablished value of confidentiality to EPSTEIN. It is with regard to this second argument that recent public disclosures have demonstrated the need for further discovery and require a stay of the resolution of the pending motion to allow for completion of that discovery.

5. On Friday, December 19, 2014, a report appeared in the public media alerting EDWARDS and his counsel for the first time of a substantial financial commitment made by EPSTEIN in an apparent effort to lessen the severe injuries to his public image suffered as a

consequence of the focus of international attention on his criminal conduct. (See Exhibit #1 attached).

6. How much time, effort and money EPSTEIN spent and committed to spend on public relations efforts is clearly relevant and material to the value he placed on BRADLEY EDWARDS' silence. If EDWARDS is able to demonstrate that EPSTEIN expended hundreds of thousands of dollars in money and services to combat adverse publicity, that information is probative of the value he himself placed on avoiding that publicity entirely by gagging BRADLEY EDWARDS.

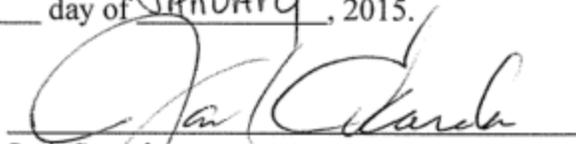
7. Accordingly, BRADLEY EDWARDS seeks the opportunity to depose JEFFREY EPSTEIN regarding his public image-related expenditures and to obtain documentary evidence relevant to such expenditures.

8. Considering the pendency of the appeal on the underlying summary judgment issued in favor of EPSTEIN (Appellate Brief attached as Exhibit #2), EPSTEIN will suffer no harm by virtue of the requested stay.

WHEREFORE, BRADLEY EDWARDS requests a stay of further briefing and hearings with regard to EPSTEIN'S Motion for Fees and Costs to permit the discovery described herein. Assuming EPSTEIN'S cooperation in the process of setting his deposition and responding to discovery requests, a stay of 60 days is expected to be adequate.

EDWARDS ADV. EPSTEIN
Case No.: 502009CA040800XXXXMBAG
Motion to Stay Proceedings Pending Completion of Additional Discovery

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 5th day of JANUARY, 2015.



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