

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).

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MOTION TO COMPEL DISCLOSURE REGARDING FEE CLAIM

Bradley J. Edwards, by and through his undersigned, moves this Honorable Court to compel the disclosure of the amount and basis for the Counter-Defendant, Epstein's claim for fees and in support would show:

1. Epstein claims fees pursuant to the rejection by Edwards of Epstein's proposal for settlement and the subsequent entry of Summary Judgment in favor of Epstein.

2. The Court has ordered mediation in this matter to encompass all issues between the parties including Epstein's claim for fees which has been stated to exceed a million dollars.

3. Epstein has retained Attorney Jay White as his expert regarding fees, and has had months in which to prepare his case in support of his fee claim which until recently had been scheduled on the Court's current trial calendar.

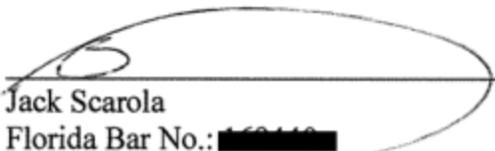
4. Edwards has made repeated efforts over an extended period of time to obtain discovery regarding the fee claim including either a report from or deposition of Jay White, but

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Epstein has refused to provide this discovery. As a consequence, Edwards has no knowledge of the amount of the fee claim or the manner in which it is intended to be calculated.

Wherefore, Edwards requests entry of an order requiring Epstein to either provide a detailed expert witness report from Jay White, to produce White for deposition, or to strike Epstein's claim for fees.

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 31st day of July, 2015.



Jack Scarola
Florida Bar No.: [REDACTED]
Attorney E-Mail(s): [REDACTED] and
[REDACTED]
Primary E-Mail: [REDACTED]
Searcy Denney Scarola Barnhart & Shipley, [REDACTED].
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Bradley J. Edwards

COUNSEL LIST

William Chester Brewer, Esquire
[REDACTED]; [REDACTED]
250 S Australian Avenue, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Jack A. Goldberger, Esquire
[REDACTED];
Atterbury Goldberger & Weiss, [REDACTED].
250 Australian Avenue S, Suite 1400
West Palm Beach, FL 33401
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire
[REDACTED]
Farmer Jaffe Weissing Edwards Fistos &
Lehrman, [REDACTED].
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]

Fred Haddad, Esquire
[REDACTED];
Fred Haddad, [REDACTED].
One Financial Plaza, Suite 2612
Fort Lauderdale, FL 33394
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire
[REDACTED];
Tonja Haddad, [REDACTED].
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
Phone: [REDACTED]
Fax: [REDACTED]
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire
[REDACTED]
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
[REDACTED]
Attorneys for Scott Rothstein