

**DRAFT**

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

CIRCUIT CIVIL DIVISION AG  
CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually;  
BRADLEY J. EDWARDS, individually; and  
█, individually,

Defendants.

**JOINT DISCOVERY SCHEDULE**

Pursuant to this Court's Order, dated April 22, 2015, counsel for Plaintiff/Counter-Defendant, JEFFREY EPSTEIN ("EPSTEIN"), and counsel for Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS ("EDWARDS"), hereby agree to the following Joint Discovery Schedule:

1. **DISCLOSURES**

EPSTEIN shall disclose to EDWARDS by **FRIDAY - JUNE 5, 2015<sup>1</sup>** - all attorney time records for legal services rendered in connection with this matter for which EPSTEIN claims ~~entitlement~~ <sup>AND AGREEMENTS</sup>. These records may be redacted to properly protect any attorney/client and/or work product information.

EPSTEIN shall disclose all taxable costs claimed by him, as well as all agreements/<sup>FEE'S AND</sup> invoices pursuant to which the costs were incurred, as well as any and all documents reflecting payment of same by **WEDNESDAY - JULY 15, 2015**.

2. **EXHIBITS**

The parties shall exchange lists of all hearing exhibits no later than **MONDAY - JULY 20, 2015**.

<sup>1</sup> Because Appellate Fees have yet to be addressed by the Court, this Discovery Order is inapplicable to those costs and fees and may be amended/modified upon the Court's ruling on same.

3. WITNESSES

The parties shall exchange Lists of names and addresses of all Witnesses and Expert Witnesses - no later than **FRIDAY, JUNE 19, 2015**. Rebuttal witnesses shall be disclosed no later than **FRIDAY, JULY 10, 2015**.

For all Expert Witnesses, the parties shall provide:

- a. the subject matter about which the Expert is expected to testify;
- b. the substance of the facts and opinions to which the Expert is expected to testify;
- c. a copy of any written reports issued by the Expert regarding this case; and
- d. a copy of the Expert's curriculum vitae

4. DISCOVERY

All discovery must be completed no later than **FRIDAY, JULY 31, 2015**.

5. MEDIATION : THE PARTIES ARE IN [REDACTED] THAT THERE IS ABSOLUTELY NO CHANCE OF A SUCCESSFUL MEDIATION <sup>PREVIOUS TO</sup> RESOLUTION OF PENDING APPELLATE ISSUES.  
DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2015.

W. CHESTER BREWER, JR., [REDACTED]  
Attorneys for Jeffrey Epstein

SEARCY, DENNEY, SCAROLA  
BARNHART & SHIPLEY, P.A.  
Attorneys for Bradley J. Edwards

By: \_\_\_\_\_  
W. CHESTER BREWER, JR.  
Florida Bar No. 261858

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