

EXHIBIT A

NOT A CERTIFIED COPY

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants,

_____ /

COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
SECOND AMENDED EXHIBIT LIST

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his
Amended Exhibit List as follows:

INDEX TO OBJECTIONS

- | | |
|--|---|
| O. No objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No. 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J. Edwards, Second Amended Exhibit List

Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Epstein Property Inspection, 01/18/10.			

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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

17.	Application for Search Warrant of Jeffrey Epstein's home.			
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (<i>from Palm Beach State Attorney's File, Exhibit #29</i>).			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			
32.	List of properties and vehicles in Larry Visoski's name.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
34.	All discovery related responses of Jeffrey Epstein in this matter and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.			
36.	All Complaints in which Jeffrey Epstein is/was a defendant.			
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.			
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.			
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.			
41.	Report and Analysis of Jeffrey Epstein's assets.			

42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR), 07/09/2008			
47.	Expert Dr. L. Dennison Reed's Report of Victim.			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez,			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

	Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts.			
67.	Documents related to Jeffrey Epstein's investments.			
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)D			
70.	Letter from Guy Fronstin to Assistant State Attorney, 01/11/06.			
71.	Letter from Guy Fronstin to Assistant State Attorney, 01/13/06.			

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72.	Letter from Guy Fronstin to Assistant State Attorney, 02/17/06.			
73.	Letter from Guy Fronstin to Assistant State Attorney, 04/06/06.			
74.	Letter from Guy Fronstin to Assistant State Attorney, 04/10/06.			
75.	Letter from Goldberger, 06/22/06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 04/19/06 and Statute 90.410.			
84.	Guy Fronstin letter dated 04/17/06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			

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88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes, re: Maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher, 05/01/06.			
95.	Alexandra Hall Police Report, 11/28/04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter to Virginia Roberts, 09/03/08			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			

106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			

117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			
122.	All flight logs for any Jeffrey Epstein owned or controlled aircraft.			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			

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129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011.			
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001.			
134.	Hand Drawing of Bart Simpson (signed by Matt Groening).			
135.	Proposed Joint Letter to the Special Master.			
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).			
137.	Color photo of Virginia Roberts on ferry "New York".			
138.	Scenic photo of Time Square.			
139.	Virginia Roberts photo on back of ship.			
140.	Picture of room in New York.			
141.	Color photo of man on horse (New Mexico Ranch).			
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch).			
143.	Virginia Roberts photo on horse front of ranch.			
144.	Virginia Roberts photo standing against rocks (red coat).			

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145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date).			
146.	Virginia Roberts photo riding horse blue jacket far.			
147.	Virginia Roberts photo on side of horse hand up.			
148.	Virginia Roberts photo on side of horse.			
149.	Virginia Roberts photo outside next to tables.			
150.	Virginia Roberts photo red coat leaning on rail.			
151.	Virginia Roberts photo standing outside next to fireplace.			
152.	Virginia Roberts photo standing in front of ranch.			
153.	Virginia Roberts photo with hand over head (black/white).			
154.	Virginia Roberts photo standing next to piano.			
155.	Virginia Roberts photo in front of fireplace (museum).			
156.	Virginia Roberts photo in front of wagon in museum.			
157.	Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico).			
158.	Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building.			
159.	Virginia Roberts (Australia Storage): Photo Book 2.			
160.	Cover photo book 2.			
161.	Scenic photo (with back photo white).			
162.	Scenic photo (with back photo white).			
163.	Scenic photo (with back photo white).			

164.	Scenic photo (with back photo white).			
165.	Virginia Roberts steps with trees overhead.			
166.	Scenic photo (with back photo white).			
167.	Scenic photo (with back photo white).			
168.	Scenic photo (with back photo white).			
169.	Scenic photo (with back photo white).			
170.	Scenic photo (with back photo white and black).			
171.	Scenic photo (with back photo white and black).			
172.	Scenic photo (with back photo white and black).			
173.	Virginia Roberts on steps with children (with back photo white and black).			
174.	Virginia Roberts on street white wall (far) (with back photo white and black).			
175.	Travel envelope.			
176.	Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts.			
177.	Thailand Hotel Receipts.			
178.	Court Docket for Jane Doe No. 102 v. Epstein.			
179.	Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein.			
180.	Ghislaine Maxwell deposition, 04/22/16			
181.	FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11.			
182.	Mark Epstein Deposition.			

183.	March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File).			
184.	Color photos of Ghislaine Maxwell, one with Jeffrey Epstein.			
185.	Airport Codes (<i>Demonstrative</i>).			
186.	March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!			
187.	DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1.			
188.	[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05.			
189.	Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account.			
190.	Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files).			
191.	Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005.			
192.	Folder titled Sara Kellen: AT&T February 12, 2005 Statement.			
193.	Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez.			
194.	Santa Monica Police Report (May 12, 1997).			
195.	Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein.			

196.	Palm Beach House/Information Sheet.			
197.	Sworn Statement of Juan Alessi taken by Palm Beach Police Department.			
198.	Juan Alessi Deposition (Vol. I) 09/08/09.			
199.	Juan Alessi Deposition (Vol II) 09/08/09.			
200.	Brochure for Boeing Super 727-100.			
201.	Passport application; issued January 12, 2001.			
202.	Sentencing Transcript, Alfredo Rodriguez.			
203.	Criminal Complaint – Alfredo Rodriguez.			
204.	Plea Agreement – Alfredo Rodriguez.			
205.	Photos of Jeffrey Epstein's properties and planes.			
206.	Photos of Jeffrey Epstein employees and former employees.			
207.	Jeffrey Epstein Guilty Plea documents.			
208.	Palm Beach County State Attorney's Response to Public Records Request (<i>including audio recordings</i>).			
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
211.	Any and all documents produced in this action.			
212.	Any and all depositions taken in this action.			
213.	Any documents or other exhibit attached to or used during any deposition in this action.			

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214.	Any and all exhibits, documents, etc. referred to in any deposition.			
215.	Any and all documents and exhibits designated by all parties to this action.			
216.	Any and all exhibits needed for impeachment or rebuttal.			
217.	Any and all pleadings filed in this action.			
218.	Any and all records produced or that will be produced by all records custodians relative to this action.			

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 7th day of December, 2017.



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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT'S OBJECTIONS TO DEFENDANT/
COUNTER-PLAINTIFF'S SECOND AMENDED EXHIBIT LIST**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his Objections to Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") Second Amended Exhibit List dated December 7, 2017, and states:

PRELIMINARY STATEMENT

On November 9, 2017, Edwards filed his Amended Exhibit List identifying 142 exhibits. (D.E. 1043.) On November 15, 2017, Epstein filed his Objections to Edwards' exhibits. (D.E. 1058.) In addition, on November 17, 2017, Epstein filed his Revised Omnibus Motion in Limine which, in part, addressed those objections. (D.E. 1070.) The Court heard extensive arguments on Epstein's objections at special set hearings on November 29, 2017, and December 5, 2017, and made rulings on those objections. While, to date, an Order has not been entered memorializing those rulings, Epstein incorporates them herein.

On December 7, 2017, Edwards filed a Second Amended Exhibit List identifying 218 exhibits, which modified some of his earlier disclosed exhibits and identified 79 new items.¹ (D.E. 1109.) At no time during the special set hearings did Edwards' counsel advise the Court that he intended to amend the Exhibit List or that the parties and Court were working from an incorrect list.

Epstein will be filing a renewed Motion in Limine to address Edwards' newly disclosed exhibits. For ease of reference, Epstein has highlighted the changes and new items identified.

OBJECTIONS

LEGEND FOR OBJECTIONS:

- 1 – All Objections
- 2 – All Objections except Authenticity
- 3 - Relevance
- 4 – Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence
- 5 – Privileged
- 6 - Opinion
- 7 – Hearsay
- 8 – Authenticity
- 9 – Other (please identify basis of objection)
- 10 – Completeness
- 11 – Overbroad
- 12 – Not provided to Counsel for Epstein Prior to Filing Pretrial Stipulation
- 13 – Not a proper exhibit
- 14 – Trade secrets/Confidential

No.	Edwards' Exhibit Description	Epstein's Objections
1.	All applicable criminal statutes	3, 4, 7, 11, 12
2.	All applicable Florida Statutes	3, 4, 7, 11, 12
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12

¹ While Edwards produced many of the new exhibits on November 9, 2017, he never identified them as trial exhibits on his Exhibit List and Epstein was not aware that he intended to rely on them at trial at the time of filing his Omnibus Motion in Limine.

No.	Edwards' Exhibit Description	Epstein's Objections
4.	Order confirmation from <u>Amazon.com</u> for purchase of books "SM 101: A realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"	3, 4, 7, 8
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10
6.	Jane Doe 102 Complaint	3, 4, 7, 13
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11 14
12.	Jail Visitation Logs	3, 4, 7, 8, 11
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8
16.	Video of <u>Epstein Property Inspection</u> , 01/18/10	3, 4, 8
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8, Cannot be read
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")
19.	All records of homes, properties, bank accounts and any/all records related to Jeffrey Epstein's assets	12
20.	Jeffrey Epstein's passport (or copy)	12
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12

No.	Edwards' Exhibit Description	Epstein's Objections
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (from Palm Beach State Attorney's File, Exhibit #29)	3, 4, 7, 8, 10,
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation	3, 4, 7, 8, 10, 11, 14
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12
32.	List of properties and vehicles in Larry Visoski's name	3, 4, 7, 8, 11, 13, The exhibit provided was an entire Motion (which was denied) not just the identified item.
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13
36.	All Complaints in which Jeffrey Epstein is/was defendant	3, 4, 11, 12, 13. This also includes a motion which is not part of the stated exhibit.
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB	3, 4, 11, 12, 13
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG	3, 4, 11, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR) 07/09/2008	3, 4, 7, 8, 14
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant	3, 4, 7, 8, 12
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)	3, 4, 7, 8
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)	3, 4, 7, 8
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13
77.	Documents related to the rental of a vehicle for Vanessa Zalis	3, 4, 7, 8, document produced contains other items not identified on list
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10

No.	Edwards' Exhibit Description	Epstein's Objections
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11
91.	Jeffrey Epstein notepad notes re Maria	3, 4, 7, 8, 10, 12
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10
96.	Victim's school records and transcripts	3, 4, 7, 8
97.	Victim Notification letter to Virginia Roberts, 09/03/08	3, 4, 7, 8
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts	3, 4, 7, 8, 12 (items not provided)
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto	3, 4, 7, 8, 12, 13
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause	3, 4, 7, 8, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits	12
109.	Edwards reserves all objections to Epstein's Exhibits	Not an exhibit
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.	3, 4, 7, 8, 12, 13
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez	3, 4, 7, 8, 11, 14 (duplicative of Exhibit No. 8)
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009	
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13

No.	Edwards' Exhibit Description	Epstein's Objections
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013	3, 4, 7, 13
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012	
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001	3, 4, 6, 7, 8, 10
134.	Hand Drawing of Bart Simpson (signed by Matt Groening)	3, 4, 7, 8
135.	Proposed Joint Letter to the Special Master	3, 4, 6, 7, 8
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago)	3, 4, 7, 8
137.	Color photo of Virginia Roberts on ferry "New York"	3, 4, 7, 8
138.	Scenic photo of Time Square	3, 4, 7, 8
139.	Virginia Roberts photo on back of ship	3, 4, 7, 8
140.	Picture of room in New York	3, 4, 7, 8
141.	Color photo of man on horse (New Mexico Ranch)	3, 4, 7, 8
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch)	3, 4, 7, 8
143.	Virginia Roberts photo on horse front of ranch	3, 4, 7, 8
144.	Virginia Roberts photo standing against rocks (red coat)	3, 4, 7, 8
145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date)	3, 4, 7, 8
146.	Virginia Roberts photo riding horse blue jacket far	3, 4, 7, 8
147.	Virginia Roberts photo on side of horse hand up	3, 4, 7, 8
148.	Virginia Roberts photo on side of horse	3, 4, 7, 8
149.	Virginia Roberts photo outside next to tables	3, 4, 7, 8
150.	Virginia Roberts photo red coat leaning on rail	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
151.	<u>Virginia Roberts photo standing outside next to fireplace'</u>	<u>3, 4, 7, 8</u>
152.	<u>Virginia Roberts photo standing in front of ranch'</u>	<u>3, 4, 7, 8</u>
153.	<u>Virginia Roberts photo with hand over head(black/white)'</u>	<u>3, 4, 7, 8</u>
154.	<u>Virginia Roberts photo standing next to piano'</u>	<u>3, 4, 7, 8</u>
155.	<u>Virginia Roberts photo in front of fireplace(museum)'</u>	<u>3, 4, 7, 8</u>
156.	<u>Virginia Roberts photo in front of wagon in museum'</u>	<u>3, 4, 7, 8</u>
157.	<u>Color photo of Virginia Roberts in front of museum'</u> <u>exhibition (Santa Fe, New Mexico)'</u>	<u>3, 4, 7, 8</u>
158.	<u>Photograph in Spain Jeffrey Epstein and Ghislaine'</u> <u>Maxwell in front of building.'</u>	<u>3, 4, 7, 8</u>
159.	<u>Virginia Roberts (Australia Storage): Photo Book 2</u>	<u>3, 4, 7, 8</u>
160.	<u>Cover photo book 2</u>	<u>3, 4, 7, 8</u>
161.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
162.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
163.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
164.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
165.	<u>Virginia Roberts steps with trees overhead</u>	<u>3, 4, 7, 8</u>
166.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
167.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
168.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
169.	<u>Scenic photo (with back photo white)'</u>	<u>3, 4, 7, 8</u>
170.	<u>Scenic photo (with back photo white and black)'</u>	<u>3, 4, 7, 8</u>
171.	<u>Scenic photo (with back photo white and black)'</u>	<u>3, 4, 7, 8</u>
172.	<u>Scenic photo (with back photo white and black)'</u>	<u>3, 4, 7, 8</u>
173.	<u>Virginia Roberts on steps with children (with back photo'</u> <u>white and black)'</u>	<u>3, 4, 7, 8</u>
174.	<u>Virginia Roberts on street white wall (far) (with back'</u> <u>photo white and black).'</u>	<u>3, 4, 7, 8</u>
175.	<u>Travel envelope'</u>	<u>3, 4, 7, 8</u>
176.	<u>Singapore Airlines Travel Cover with handwritten notes by'</u> <u>Virginia Roberts'</u>	<u>3, 4, 7, 8</u>

No.	Edwards' Exhibit Description	Epstein's Objections
177.	<u>Thailand Hotel Receipts</u>	<u>3, 4, 7, 8</u>
178.	<u>Court Docket for Jane Doe No. 102 v. Epstein</u>	<u>3, 4, 7, 8, 13</u>
179.	<u>Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein</u>	<u>3, 4, 7, 8, 10</u>
180.	<u>Ghislaine Maxwell deposition, 04/22/16</u>	<u>3, 4, 7, 8, 14</u>
181.	<u>FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11</u>	<u>3, 4, 7, 8, 10</u>
182.	<u>Mark Epstein Deposition</u>	<u>3, 4, 7, 8</u>
183.	<u>March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File)</u>	<u>3, 4, 7, 8, 10</u>
184.	<u>Color photos of Ghislaine Maxwell, one with Jeffrey Epstein</u>	<u>3, 4, 7, 8</u>
185.	<u>Airport Codes (Demonstrative)</u>	<u>3, 7, 8, 10</u>
186.	<u>March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!</u>	<u>3, 4, 7, 8</u>
187.	<u>DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1</u>	<u>3, 4, 7, 8, 12 (only photo of DVDs provided)</u>
188.	<u>[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05</u>	<u>3, 4, 7, 8, 10</u>
189.	<u>Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account</u>	<u>3, 4, 7, 8, 10, 11</u>
190.	<u>Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files)</u>	<u>3, 4, 7, 8, 10, 11</u>
191.	<u>Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005</u>	<u>3, 4, 7, 8, 10, 11</u>
192.	<u>Folder titled Sara Kellen: AT&T February 12, 2005 Statement</u>	<u>3, 4, 7, 8, 10, 11</u>
193.	<u>Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez</u>	<u>3, 4, 7, 8, 10, 14</u>
194.	<u>Santa Monica Police Report (May 12, 1997)</u>	<u>3, 4, 7, 8</u>
195.	<u>Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein</u>	<u>3, 4, 7, 8</u>
196.	<u>Palm Beach House/Information Sheet</u>	<u>3, 4, 7, 8</u>
197.	<u>Sworn Statement of Juan Alessi taken by Palm Beach Police Department</u>	<u>3, 4, 7, 8</u>
198.	<u>Juan Alessi Deposition (Vol. I) 09/08/09</u>	<u>3, 4, 7, 8</u>

No.	Edwards' Exhibit Description	Epstein's Objections
199.	<u>Juan Alessi Deposition (Vol II) 09/08/09</u>	<u>3, 4, 7, 8</u>
200.	<u>Brochure for Boeing Super 727-100</u>	<u>3, 4</u>
201.	<u>Passport application; issued January 12, 2001</u>	<u>3, 4, 7, 8, 10</u>
202.	<u>Sentencing Transcript, Alfredo Rodriguez</u>	<u>3, 4, 6, 7</u>
203.	<u>Criminal Complaint — Alfredo Rodriguez</u>	<u>3, 4, 6, 7</u>
204.	<u>Plea Agreement — Alfredo Rodriguez</u>	<u>3, 4, 7, 8</u>
205.	<u>Photos of Jeffrey Epstein's properties and planes</u>	<u>3, 4, 7, 8, 10</u>
206.	<u>Photos of Jeffrey Epstein employees and former employees</u>	<u>3, 4, 7, 8, 10</u>
207.	<u>Jeffrey Epstein Guilty Plea documents</u>	<u>3, 4</u>
208.	<u>Palm Beach County State Attorney's Response to Public Records Request (including audio recordings)</u>	<u>3, 4, 6, 7, 8, 10, 11, 13</u>
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition	3, 4, 6, 7, 8, 10, 11, 12, 13, 14
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12, 13
211.	Any and all documents produced in this action.	12
212.	Any and all depositions taken in this action.	12, 13
213.	Any documents or other exhibit attached to or used during any deposition in this action	12, 13
214.	Any and all exhibits, documents, etc. referred to in any deposition	12, 13
215.	Any and all documents and exhibits designated by all parties to this action.	12, 13
216.	Any and all exhibits needed for impeachment or rebuttal	12
217.	Any and all pleadings filed in this action	12, 13
218.	Any and all records produced or that will be produced by all records custodians relative to this action	12, 13

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
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By: /s/ Scott J. Link

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EXHIBIT B

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
AMENDED EXHIBIT LIST

Plaintiff/Counter-Defendant Jeffrey Epstein hereby files this list of the trial exhibits he may introduce at the trial of this matter.

INDEX TO OBJECTIONS

- | | |
|--|---|
| 0. No Objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
<i>Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards and L.M.</i> 15th Judicial Circuit Case No. 50-2009-CA-040800XXXXMB					
1	12/7/09	Complaint with Exhibits			
2	12/21/09	Answer and Counterclaim of Defendant Bradley J. Edwards			
3	1/21/10	Default against Scott Rothstein			
4	8/2/10 8/9/10	Stipulation and Order of Dismissal with Prejudice as to L.M., Individually Only			
5	3/27/12	Notice of Appearance of Bradley J. Edwards			
6	8/16/12	Notice of Voluntary Dismissal Without Prejudice of Bradley J. Edwards			
7	1/9/13	Bradley J. Edwards' Fourth Amended Counterclaim			
8	9/25/13	Affidavit of Jeffrey Epstein			
9	6/30/17	Affidavit of Jeffrey Epstein			
10	6/30/17	Jeffrey Epstein's Motion for Summary Judgment, Appendix in Support and all documents cited therein			
11	Misc.	All deposition transcripts, exhibits and videotapes including, but not limited to: a. Bradley J. Edwards (3/23/10; 5/15/13; 10/10/13; 11/10/17) b. Jeffrey Epstein (3/17/10; 1/25/12) c. Scott Rothstein (6/14/12) d. Russell Adler (4/20/11) e. Abrakas Joseph Discala (5/25/11) f. Dean Russell Kretschmar (2/11/11) g. Michael Legamaro (3/11/11) h. Courtney Wild (10/12/17)			
12	Misc.	Defendant/Counter-Plaintiff Bradley J. Edwards' Answers, Responses, Objections and Privilege Logs in response to Plaintiff/Counter-Defendant Jeffrey Epstein's Interrogatories, Requests for Admission, Requests for Production, and Subpoenas Duces Tecum			
13	Misc.	All documents produced by any party or non-party in this matter			
14	Misc.	All documents filed in the court file, including pleadings, motions, responses, affidavits, discovery, and exhibits			
15	Misc.	All hearing transcripts			
<i>State of Florida v. Jeffrey Epstein</i> 15th Judicial Circuit					

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
16	4/24/07	Transcript of Taped Statement of Tatum Miller			
17	Misc.	All other testimony, transcripts and statements provided in the matter			
<i>L.M. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028051XXXXMB					
18	Misc.	Court docket and all court filings referenced therein			
19	9/11/08	Complaint			
20	12/23/08	Amended Complaint			
21	3/30/09	Notice of Change of Firm and Address			
22	4/7/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint			
23	8/19/09 9/11/09	Notices of Production from Non Parties: (1) Stephen Alexander, M.D.; (2) Bruce W. Markowitz, M.D.; and (3) Charles J. Galecki, M.D.			
24	8/24/09	Notices of Taking Deposition and Subpoenas to (1) Lawrence Paul Visoski, Jr. and (2) David Hart Rogers			
25	8/11/09	Plaintiff's Request for Production to Defendant			
26	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint			
27	5/28/10	Plaintiff's Third Amended Complaint			
28	7/22/10	Stipulation of Dismissal With Prejudice			
29	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. L.M. (9/24/09; 2/9/10)			
<i>L.M. v. Jeffrey Epstein</i> USDC S.D. Fla. Case No. 09-CV-81092					
30	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
31	7/24/09	Complaint and Demand for Jury Trial			
32	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 21)			
33	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
34		Federal Rule of Civil Procedure, Rule 11			
<i>E.W. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028058XXXXMB					
35	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
36	9/10/08	Complaint			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
37	12/23/08	Amended Complaint			
38	3/30/09	Notice of Change of Firm and Address			
39	4/6/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint			
40	6/2/09	Defendant Epstein's Motion for Order to Terminate or Limit Deposition and Response in Opposition to Plaintiff's Amended Motion to Compel for Sanctions			
41	7/16/09	Cross Notice of Taking Videotaped Deposition of Alfredo Rodriguez			
42	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint			
43	8/10/09	Plaintiff's Request for Entry Upon Land			
44	5/28/10	Plaintiff's Third Amended Complaint			
45	7/22/10	Stipulation of Dismissal With Prejudice			
46	7/29/10	Order Adopting Stipulation and Dismissing Case With Prejudice			
47	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. E.W. (5/6/10)			
<p align="center">Jane Doe v. Jeffrey Epstein USDC S.D. Fla. Case No. 08-CV-80893</p>					
48	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
49	8/12/08	Complaint (D.E. 1)			
50	3/26/09	Defendant Epstein's Motion to Stay and/or Continue Action for Time Certain Based on Parallel Civil and Criminal Proceedings with Incorporated Memorandum of Law (D.E. 24)			
51	4/9/09	Notice of Change of Address and Firm Affiliation (D.E. 30)			
52	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorney's from Revealing Provisions in the Agreement (D.E. 32)			
53	4/17/09	Plaintiff's First Amended Complaint (D.E. 38)			
54	5/14/09	Order Consolidating Cases for Purposes of Discovery and Procedural Motions that Relate to Multiple Cases (D.E. 56)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
55	7/28/09 to 10/22/09	Notices of Taking Deposition and Subpoenas to: Ghislane Noelle Maxwell, Leslie Wexler, Donald Trump, Mark Epstein, Nadia Marcinkova, Jean Luc Bruhel, Sarah Kellen, Michael Freidman, Rosalie Freidman, and Michael Sanka			
56	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 210)			
57	7/20/10	Final Order of Dismissal With Prejudice (D.E. 211)			
58	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<p align="center"><i>Jane Doe 2 v. Jeffrey Epstein (Consolidated Action)</i> USDC S.D. Fla. Case No. 08-CV-80119</p>					
59	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
60	6/19/09	Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165)			
61	7/23/09	Plaintiff Jane Doe's Reply Memorandum in Support of Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 217)			
62	10/16/09	Plaintiff Jane Doe's Notice that Additional Evidence of Epstein's Fraudulent Asset Transfers Will be Filed Shortly, etc. (D.E. 357)			
63	10/30/09	Plaintiff Jane Doe's Motion for Leave to Provide Recently-Obtained Deposition Testimony and Affidavit Demonstrating Fraudulent Transfers by Epstein in Support of Motion for Appointment of a Receiver to Take Charge of Property of Epstein and Incorporated Supporting Memo of Law (D.E. 386)			
64	11/5/09	Order (D.E. 400)			
65	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<p align="center"><i>Jane Doe v. United States of America (CVRA)</i> USDC S.D. Fla. Case No. 08-80736-CIV</p>					
66	7/7/08	Emergency Victim's Petition for Enforcement of Crime Victim's Rights Act, 18 U.S.C. Section 3771 (D.E. 1)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
67	8/14/08	Transcript of Hearing Before the Honorable Kenneth A. Marra			
<i>Rothstein Rosenfeldt Adler and Stuart Rosenfeldt v. Scott W. Rothstein</i> 17th Judicial Circuit Broward County Case No. 2009-CA-059301-AXXXCE					
68	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
69	11/3/09	Amended Complaint			
70	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<i>In re Rothstein Rosenfeldt Adler, P.A.</i> USBC S.D. Fla. Case No. 09-34791-RBR					
71	11/16/09	Motion of the U.S. Trustee for an Order Directing the Appointment of a Chapter 11 Trustee and Objection to Retention of Chief Restructuring Officer (D.E. 8)			
72	12/1/09	Verified Complaint for Damages and Other Relief (D.E. 74)			
73	2/23/11	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman			
74	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein (12/12/11); b. Jack (John) Scarola's (7/2/13); and c. Russell Adler (10/28/10).			
<i>United States of America v. Scott Rothstein – Forfeiture Action</i> USDC S.D. Fla. Case No. 09-CV-61780-Zloch-Rosenbaum					
75	11/9/09	Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 1)			
76	11/23/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 14)			
77	11/27/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 19)			
<i>The Florida Bar Matters</i>					
78	11/9/09	The Florida Bar Inquiry/Complaint Form Jeffrey Epstein filed against Bradley J. Edwards, William Berger and Scott Rothstein			
79	11/25/09	Approval of Scott Rothstein's disbarment; <i>The Florida Bar v. Scott Walter Rothstein</i> ; Supreme Court Case No. SC09-2146			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
80	6/24/10	The Florida Bar's Notice of No Probable Cause and Letter of Advice to Accused; <i>In re Complaints by Jeffrey Epstein and the Florida Bar against Bradley James Edwards</i> ; Case No. 2010-50,746(09B)			
<i>United States of America v. Scott W. Rothstein</i> USDC S.D. Fla. Case No. 09-60331					
81	12/1/09	Information charging Scott W. Rothstein			
82	1/25/10	Plea Agreement between the United States of America and Scott W. Rothstein			
83	9/26/17	Government's Motion to Withdraw its Motion for Reduction of Sentence			
<i>Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.</i> 17th Judicial Circuit, Broward County, Florida Case No. 09-062943					
84	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
85	11/20/09	Complaint			
86	11/25/09	Amended Complaint			
87	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein's testimony (12/12/11, 12/19/11, 12/20/11, 12/21/11, 12/22/11)			
Rothstein Rosenfeldt Adler – Communication					
88	4/8/09 2:58 p.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Mark S. Nurik (01404)			
89	4/22/09 4:51 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01620)			
90	4/24/09 5:07 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01446)			
91	5/19/09 10:33 a.m.	E-mail from William J. Berger to Bradley J. Edwards, Russell Adler, Steven R. Jaffe, Matthew D. Weissing and Gary M. Farmer (01726)			
92	5/19/09 12:00 p.m.	E-mail from Susan K. Stirling to Bradley J. Edwards (05725)			
93	5/19/09 12:03 p.m.	E-mail from Bradley J. Edwards to Russel Adler (01574)			
94	5/22/09 12:13 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01449)			
95	5/22/09 12:21 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05148)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
96	5/26/09 4:57 p.m.	E-mail from Bradley J. Edwards to Timothy Malloy (01450)			
97	5/26/09 5:33 p.m.	E-mail from Timothy Malloy to Bradley J. Edwards (05151)			
98	5/28/09 2:13 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05161)			
99	5/28/09 2:16 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02241-02242)			
100	6/3/09 5:17 p.m.	E-mail from William J Berger to Grace Torres, cc Russell Adler and Bradley J. Edwards (01735)			
101	6/4/09 10:43 a.m.	E-mail from Bradley J. Edwards to Susan K. Stirling, cc Carla Martinez (01410)			
102	6/9/09 3:10 p.m.	E-mail from Bradley J. Edwards to Eric Glasser (06655)			
103	6/23/09 12:52 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (Palm Beach Daily News) (01632)			
104	6/23/09 1:03 p.m.	E-mail from Bradley J. Edwards to Paul Cassell (01634)			
105	6/23/09 1:13 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05239)			
106	6/23/09 1:16 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05203)			
107	6/23/09 1:29 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05277-05278)			
108	6/23/09 2:31 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05207-05208)			
109	6/23/09 2:41 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05324-05325)			
110	6/23/09 2:53 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05212-05213)			
111	6/23/09 3:08 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05344-05346)			
112	6/23/09 3:12 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05215-05217)			
113	6/23/09 4:39 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05368-05369)			
114	6/23/09 5:22 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05220-05221)			
115	6/23/09 5:28 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05387-05388)			
116	6/24/09 9:39 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (05224-05225)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
117	7/8/09 3:36 p.m.	E-mail from Bradley J. Edwards to Russell Adler, William J. Berger and Steven R. Jaffee (01462)			
118	7/13/09 2:28 p.m.	E-mail from Michele Dargan (Palm Beach Daily News) to Bradley J. Edwards (08404)			
119	7/4/09 4:37 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02204)			
120	7/15/09 1:17 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (04906)			
121	7/15/09 1:22 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (04905)			
122	7/18/09 4:10 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01661)			
123	7/21/09 8:21 p.m.	E-mail from Bradley J. Edwards to Michele Leone (01352)			
124	7/22/09 11:22 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01479)			
125	7/22/09 11:35 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05803)			
126	7/22/09 1:29 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards (01662)			
127	7/22/09	Letter from Bradley J. Edwards re cross noticing depositions			
128	7/26/09 5:28 p.m.	E-mail from Priscila A. Nascimento to Scott Rothstein, cc Amy N. Howard and Adelita Cabello (25860-25863)			
129	7/28/09 8:59 a.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01483)			
130	7/28/09 8:59 a.m.	E-mail from Susan Spencer Wendel to Bradley J. Edwards (03070)			
131	7/28/09 9:28 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01486)			
132	7/28/09 10:00 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05848)			
133	7/29/09 1:13 p.m.	E-mail from Cara L. Holmes to Bradley J. Edwards (08420)			
134	7/28/09 1:47 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (11075-11076)			
135	7/29/09 1:49 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05852-05853)			
136	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05535-05536)			
137	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (11320-11322)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
138	7/30/09 6:06 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05538-05539)			
139	7/31/09 11:20 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (11080-11082)			
140	8/10/09 6:59 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06965)			
141	8/10/09 7:23 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06967)			
142	8/11/09 8:43 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06968-06969)			
143	8/11/09 9:29 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06963-06964)			
144	8/11/09 10:10 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06970-06971)			
145	8/11/09 12:34 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06959-06960)			
146	8/14/09 4:40 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06975)			
147	8/15/09 2:41 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Ken Jenne (01685)			
148	8/15/09 6:00 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06972-06973)			
149	8/17/09 10:32 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06976-06977)			
150	8/17/09 10:42 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (02442)			
151	8/19/09 2:47 p.m.	E-mail from Bradley J. Edwards to Ken Jenne (01501)			
152	8/24/09 7:38 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (01506)			
153	8/25/09 11:03 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (05952-05953)			
154	8/26/09 9:56 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (02269)			
155	8/31/09 10:58 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02895)			
156	9/2/09 12:54 p.m.	E-mail from Elizabeth Villar to Bradley J. Edwards and Ken Jenne, cc Jacquie Johnson, Pat Roberts and Mike Fisten (01376)			
157	9/7/09 1:39 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07612-07613)			
158	9/7/09 6:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02595-02596)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
159	9/7/09 6:49 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07614-07615)			
160	9/7/09 7:00 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07605-07606)			
161	9/7/09 8:12 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07607-07608)			
162	9/7/09 10:55 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07609-07611)			
163	9/8/09 11:43 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04015)			
164	9/8/09 11:50 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07646)			
165	9/8/09 11:53 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07647)			
166	9/8/09 12:04 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07676-07677)			
167	9/8/09 1:59 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07674-07675)			
168	9/8/09 2:04 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07678-07679)			
169	9/8/09 2:36 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07684-07685)			
170	9/8/09 2:42 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07682-07683)			
171	9/8/09 2:49 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07695-07697)			
172	9/8/09 3:25 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07680-07681)			
173	9/8/09 7:51 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07686-07688)			
174	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07689-07691)			
175	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07692-07694)			
176	9/15/09 1:08 p.m.	E-mail from Bradley J. Edwards to Elizabeth Villar, cc Ken Jenne and Pat Roberts (01361)			
177	9/18/09 12:35 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01318)			
178	9/18/09 12:35 p.m.	E-mail from Jacquie Johnson to Ann Marie Villafana, cc Bradley J. Edwards (01583)			
179	9/18/09 1:01 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (05619-05620)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
180	9/18/09 2:37 p.m.	E-mail from Bradley J. Edwards to Beth S. Williamson (01144)			
181	9/18/09 2:55 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (01280-01288)			
182	9/21/09 1:37 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03081)			
183	9/23/09 8:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04320)			
184	9/24/09 6:31 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04321)			
185	9/24/09 6:53 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04318-04319)			
186	9/24/09 8:45 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (10586-10589)			
187	9/28/09 8:09 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards, cc Renee/Carlos Morrison (02913)			
188	9/28/09 10:06 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (06789)			
189	9/28/09 10:20 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (06788)			
190	9/28/09 11:45 p.m.	E-mail from Mike Fisten to Conchita Sarnoff (19986-19987)			
191	9/29/09 10:06 a.m.	E-mail from Bradley J. Edwards to Ken Jenn and Elizabeth Villar (01754)			
192	10/2/09 10:41 a.m.	E-mail from Bradley J. Edwards to Nigel Rosser (06191)			
193	10/2/09 11:08 a.m.	E-mail from Nigel Rosser to Bradley J. Edwards (06189-06190)			
194	10/2/09 4:28 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06979-06980)			
195	10/2/09 4:52 p.m.	E-mail from Bradley J. Edwards to Mike Fisten (02440-02441)			
196	10/2/09 4:53 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff, cc Jacquie Johnson (06974)			
197	10/2/09 6:14 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards, cc Jacquie Johnson (06955-06956)			
198	10/8/09 4:11 p.m.	E-mail from Bradley J. Edwards to Richard Johnson (06961)			
199	10/13/09 2:17 p.m.	E-mail from Grant J. Smith to Scott Rothstein, Bradley J. Edwards, Ken Jenne, Kip Hunter and Russell Adler, cc Grant J. Smith (26507)			
200	10/13/09 2:27 p.m.	E-mail from Mike Fisten to Bradley J. Edwards (01727)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
201	10/13/09 7:00 p.m.	E-mail from Bradley J. Edwards to Jacquie Johnson, cc Mike Fisten (01744)			
202	10/14/09 7:39 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (03190)			
203	10/14/09 9:02 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03189)			
204	10/14/09 10:42 a.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Jacquie Johnson (01099)			
205	10/14/09 12:20 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Jacquie Johnson (01741)			
206	10/16/09 5:29 a.m.	E-mail from ABA Journal Weekly Newsletter to Scott Rothstein (25864-25865)			
207	10/19/09 10:46 a.m.	E-mail from Bradley J. Edwards to Ken Jenne (01704)			
208	10/20/09 1:01 p.m.	E-mail from George Rush to Bradley J. Edwards (01433)			
209	10/20/09 3:07 p.m.	E-mail from Ken Jenne to Scott Rothstein (26506)			
210	10/22/09 11:52 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (01391)			
211	10/22/09 2:52 p.m.	E-mail from Jacquie Johnson to Russell Adler, Cara L. Holmes, Mike Fisten, Michael J. Wheeler, Marc S. Nurik, William J. Berger, Bradley J. Edwards, Barry J. Stone and Ken Jenne, cc Robert C. Buschel (01392)			
212	10/22/09 4:10 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards, Marc S. Nurik, Michael J. Wheeler, Cara L. Holmes, William J. Berger, Russell Adler and Robert C. Buschel (01307)			
213	10/26/09 7:46 a.m.	E-mail from William J. Berger to Pat Carter and Bradley J. Edwards, cc Grace Torres and Jacquie Johnson (01380)			
214	10/29/09 2:16 p.m.	E-mail from Pat Diaz to Bradley J. Edwards (01623)			
215	10/30/09 10:01 a.m.	E-mail from Debra Villegas to Scott Rothstein (26304-26305)			
216	10/30/09 10:03 a.m.	E-mail from Russell Adler to Jacquie Johnson and Bradley J. Edwards (01625)			
Billing					
217	12/21/09	Contract for Services between Searcy Denny Scarola Barnhart & Shipley and Bradley J. Edwards			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
218	N/D	Spreadsheet of Brad Edwards' Time in <i>Edwards adv. Epstein</i> (BJE000000104 – BJE000000156)			
219	7/14/10 - 1/16/13	Searcy Denney Scarola Barnhart and Shipley's Invoices for Disbursements to Bradley J. Edwards (BJE000000039 – BJE000000103)			
220	1/1/80 – 2/15/13	Search Denney Scarola Barnhart and Shipley's Matter Ledger Report (BJE000000006 – BJE000000038)			
Miscellaneous					
221	10/23/09	Rothstein Rosenfeldt Adler's Firm Directory			
222	11/9/17	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s "Our Attorneys" website printout (https://www.pathtojustice.com/about-us/attorneys/)			
223	12/1/09	Criminal Complaint; <i>United States of America v. Alfredo Rodriguez</i> ; USDC S.D. Fla. Case No. 09-8308			
224	4/23/10	Affidavit of Bradley James Edwards			
225	9/21/10	Affidavit of Bradley James Edwards			
226	Misc.	Subpoenas and Notices of Deposition for Alan Dershowitz, David Copperfield and Leonard Baird			
227	11/16/17	Critton Luttier Coleman, LLP's website printout for Robert D. Critton Jr. (https://www.lawclc.com/team_members/Robert-d-critton-jr/)			
228	11/16/17	Fowler White Burnett, P.A.'s website printout for Joseph L. Ackerman, Jr. (http://www.fowler-white.com/Attorneys/id/3/read)			
Bradley J. Edwards					
229	N/D	The National Crime Victim Bar Association presentation excerpt of article by Bradley J. Edwards: <i>Who is Responsible for Child Sexual Abuse</i>			
230	N/D	The Florida Bar's website member profile printout for Bradley James Edwards			
231	N/D	National Association of Distinguished Counsel biographical information for Bradley J. Edwards			
232	5/14/13	The National Trial Lawyers Top 40 Under 40 Directory (http://www.thenationaltriallawyers.org/top-40-under-40-directory/?last_name+Edwards&city=&state=FL&x=18&y=17)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
233	5/14/13	The National Trial Lawyers Profile View of Brad Edwards (http://www.thenationaltriallawyers.org/profile-view/Brad/Edwards/4409/)			
234	5/14/13	Lawyers.com website information for Bradley J. Edwards (http://www.lawyers.com/florida/fort-lauderdale/Bradley-J-Edwards-3489098-a/)			
235	10/30/04	Kubicki Draper's website attorney information for Brad J. Edwards			
236	10/30/05	Kubicki Draper's website attorney information for Brad J. Edwards			
237		The American Registry Website printouts of recognitions received by Bradley J. Edwards			
238	5/7/12	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)			
239	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)			
240	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/press-releases/)			
241	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. website printout (http://www.abuseandassault.com/Abuse_Home)			
242	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Notable_Cases)			
243	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards (www.pathtojustice.com/attorneys/brad-edwards/#.UZJOPpWTOX0)			
244	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/achived-press-releases/#.UZJTty5WTOX0)			
245		Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards with referenced articles			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
A.	Winter 2014	Journal of Criminal Law and Criminology. Volume 104; Issue 1. <i>Crime Victims' Rights During Criminal Investigations? Applying the Crime Victims' Rights Act Before Criminal Charges are Filed;</i>			
B.	12/26/15	<u>Politico</u> . <i>Victims in Underage Sex Case Want Prosecutors to Testify</i>			
C.	12/21/15	<u>Palm Beach Daily News</u> . <i>Jeffrey Epstein Sex Scandal: Alan Dershowitz Suffers Setback in Defamation Case</i>			
D.	12/18/15	<u>Palm Beach Daily News</u> . <i>Epstein Victims' Attorneys Seek Partial Victory in Defamation Suit</i>			
E.	12/21/15	<u>Palm Beach Post</u> . <i>Boca-Resident Model Nabs \$13.4 Million Following Six-Year Divorce Battle</i>			
F.	12/17/15	<u>Daily Mail.Com</u> . <i>Florida Model Gets Whopping \$13.4 Million Payout from Real Estate Tycoon Ex-Husband After Nasty Six-Year Divorce Battle</i>			
G.	11/25/15	<u>Palm Beach Daily News</u> . <i>Appellate Court Reverses Palm Beach Sex Offender Jeffrey Epstein's Victory</i>			
H.	11/12/15	<u>Daily Business Review</u> . <i>Attorney's Suit Against Billionaire Allowed as Long as Justices Say It's OK</i>			
I.	7/8/15	<u>Palm Beach Daily News</u> . <i>Judge Keeps Thousands of Epstein Documents Sealed</i>			
J.	6/25/15	<u>WCVB5</u> . <i>Jury Awards \$24 Million to Mass. Widower in Fatal Cabana Crash</i>			
K.	6/24/15	<u>NBC6</u> . <i>Jury Awards 24 Million in Fatal Cabana Crash</i>			
L.	6/24/15	<u>CBS Miami</u> . <i>Jury Awards Millions to Husband of Pregnant Woman Killed by Drunk Driver</i>			
M.	6/25/15	<u>Sun Sentinel</u> . <i>Jury Awards \$24 Million to Widower in Fatal Cabana Crash</i>			
N.	1/8/15	<u>Daily Business Review</u> . <i>The Lawyer Suing Legal Legend Alan Dershowitz Over Sex Offender</i>			
O.	4/21/14	<u>The Washington Post</u> . <i>Eleventh Circuit Rules that Discovery Can Move Forward on My Crime Victims' Rights Act Case</i>			
P.	4/21/14	<u>Palm Beach Daily News</u> . <i>Appeals Court Rules Against Sex Offender. Attorneys for Underage Victims Seek to Overturn "Sweetheart Plea"</i>			
Q.	4/21/14	<u>Sun-Sentinel</u> . <i>Victims Win Right to See Negotiation that Led to 'Lenient' Plea Deal Agreement for Billionaire Sex Offender</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
R.	4/21/14	<u>Palm Beach Post</u> . <i>Appellate Ruling Could Force Feds to Reconsider Sex Changes Against Palm Beacher Epstein</i>			
S.	10/20/13	<u>Palm Beach Daily News</u> . <i>Newest Lawsuit Against Epstein Expected to Include Victim Testimony</i>			
T.	9/10/12	<u>CBS Miami</u> , <i>Exclusive: Sexual Assault Victim Alleges Abuse by Former Youth Pastor</i>			
U.	9/7/12	<u>Sun-Sentinel</u> . <i>Elevator Fall Nets Woman \$13 Million Jury Award</i>			
V.	July 2012	<u>Daily Business Review</u> . <i>Top Florida Verdicts & Settlements of 2011</i>			
W.	6/13/12	<u>Daily Business Review</u> . <i>Suit Accuses Goldrush Strip Club of Scheme to Bilk Professionals</i>			
X.	4/22/11	<u>Palm Beach Daily Business Review</u> . <i>Jeffrey Epstein Amends Lawsuit; Claims Victims' Attorney Threatened to Depose His Friends</i>			
246	8/10/16	Farmer Jaffe Weissing's Facebook page with referenced articles			
A.	5/22/16	<u>Lawnewz.com</u> . <i>The Shameful Way Feds Protected Convicted Pedophile Billionaire Jeffrey Epstein</i>			
B.	5/13/16	<u>Fox News</u> . <i>Flight Logs Show Bill Clinton Flew on Sex Offender's Jet Much More than Previously Known</i>			
C.	2/11/16	<u>Sun-Sentinel</u> . <i>Feds Deceived Us About Billionaire Sex Offender's 'Sweetheart Deal' Teen Victims Say</i>			
D.	2/12/16	<u>NBC News</u> . <i>Lawyers: Victims Not Told of 'Sweetheart Deal' for Jeffrey Epstein</i>			
E.	2/11/16	<u>NY Daily News</u> . <i>Jeffrey Epstein Accusers Sue Feds Over Hidden Non-Prosecution 'Conspiracy'</i>			
F.	4/23/14	<u>Farmer, Jaffe</u> . <i>Appeals Court Rules in Favor of Crime Victims' Rights in Registered Pedophile Jeffrey E. Epstein Case</i>			
G.	4/23/14	<u>Daily Business Review</u> . <i>Prosecutors Must Turn Over Docs in Billionaire Sex Offender Jeffrey Epstein Case</i>			
247	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Court, Case No. 16-1995-MM-000074-AXXA-MA			
248	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Case No. 16-1998-CF-004394-AXXX-MA			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
249	8/14/07	Exemption and/or Limitation Exclusion – Tax Assessment of \$3,507.72			
250	1/7/08	Notice of Satisfaction of Lien Relative to Tax Exemption			
251	Misc.	Docket and all court filings referenced therein; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
252	1/21/10	Petition/Complaint; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
253	2/18/10	Bradley J. Edwards' Answer and Affirmative Defenses; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
254	8/11/10	Notice of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
255	8/11/10	Final Summary Judgment of Mortgage Foreclosure; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
256	10/22/10	Certificate of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
257	11/2/10	Certificate of Title; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
258	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
259	3/17/10	Petition/Complaint; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
260	10/4/11	Final Summary Judgment of Mortgage Foreclosure; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
261	10/10/11	Notice of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
262	1/5/12	Certificate of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
263	1/18/12	Certificate of Title; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
264	Misc.	Docket and all court filings referenced therein; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
265	12/8/11	Complaint; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
266	1/25/12	Stipulation for Settlement; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
267	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
268	3/22/12	Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
269	5/18/12	Bradley J. Edwards' Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
270	10/3/12	Order Denying Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
271	10/26/12	Answer to Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
272	11/20/12	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
273	3/15/13	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
274		Corporate Detail Printout from Sunbiz.org for The Law Office of Brad Edwards & Associates, LLC			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
275	4/16/07	Articles of Organization for Florida Limited Liability Company for The Law Office of Brad Edwards & Associates, LLC			
276	1/25/08	2008 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates			
277	3/11/09	2009 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates			
278		Florida Bar Rules including, but not limited to, Florida Bar Rule 4-7.21			
279	3/3/08	Complaint; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 1)			
280	6/17/08	Omnibus Order on Defendants' Motion to Dismiss; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 79)			
281	8/10/10	U.S. Court of Appeals Opinion; <i>Donald D. Baker v. City of Hollywood, et al.</i> ; Case No. 08-14924 & 08-15602			
282	12/9/04	<u>New Times Broward Palm-Beach</u> ; <i>Tale of the Tape</i>			
Experts					
283	10/20/17	Dr. Bernard J. Jansen's Expert Report with attachments			
284	Misc.	All documents produced, or relied upon or referenced by Dr. Bernard J. Jansen in preparing his 10/20/17 Report			
285	9/9/16	Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)			
286	11/30/16	Supplemental Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)			
287	Misc.	All public records, news articles and prior testimony of Dr. Bernard J. Jansen			
Other Articles					
288	11/1/09	<i>Kendall Coffey: Law Firm Victimized by Scott Rothstein</i>			
289	11/2/09	<u>Legal Junkies</u> . <i>WSJ Law Blog – Rothstein Rosenfeldt Adler, Ft. Lauderdale, Law Firm Dissolution, Ponzi Scheme</i>			
290	11/2/09	<u>New Times Broward-Palm Beach</u> . <i>Chief Judge: Scott Rothstein's Firm Has "No Money" and is Going into Receivership</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
291	11/3/09	<u>The New York Times</u> : <i>Fraud Accusations Against Florida Lawyer Set Off a Race to Return His Donations</i>			
292	11/3/09	<i>Rothstein Returns After Contemplating Suicide, Partner Says</i>			
293	11/3/09	<i>Florida Law Firm Asks to be Dissolved</i>			
294	11/3/09	<u>Sun Sentinel</u> . <i>Scott Rothstein's Investment Deals Seemed Too Good to be True</i>			
295	11/5/09	<u>Funds News</u> . <i>FBI Agents Search Law Firm in Missing Funds Probe</i>			
296	11/6/09	<u>New Times Broward-Palm Beach</u> . <i>Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy</i>			
297	11/6/09	<i>Rothstein Accomplice Still on Lam</i>			
298	11/7/09	<i>Tour of Scott Rothstein's Office Reveals Gallery of Who's Who</i>			
299	11/12/09	<u>Sun Sentinel</u> : <i>FBI Doubts Rothstein Ran a Ponzi Scheme Alone</i>			
300	11/13/09	<u>Palm Beach Post</u> : <i>FBI Doubts Rothstein's Scheme a 'One-Man Show'</i>			
301	11/13/09	<u>Sun Sentinel</u> . <i>High-Ranking Police Officers Guarded Over Rothstein</i>			
302	11/17/09	<i>Inside the Rothstein Swindle, Part I</i>			
303	11/17/09	<u>Sun Sentinel</u> . <i>Rothstein Asks to Voluntarily Give Up Law License</i>			
304	11/17/09	<i>Rothstein and Dreier: How Much Alike?</i>			
305	11/18/09	<i>Inside the Rothstein Swindle, Part II</i>			
306	11/18/09	<i>Former RAA Attorneys Take New Jobs</i>			
307	11/20/09	<i>Scherer Files Suit Against Rothstein, et al.</i>			
308	11/20/09	Article by Paul Brinkman			
309	11/21/09	<i>Rothstein Feeder George Levin's Ugly Past</i>			
310	11/22/09	<i>George Levin was Rothstein's Whale</i>			
311	11/23/09	<i>Rothstein Associate Levy Got Protection from Plantation Cops</i>			
312	11/23/09	<i>Main Line Firm's Clients Invested \$30 Million with 'Ponzi' Lawyer</i>			
313	11/23/09	<u>Sun-Sentinel</u> . <i>Scott Rothstein: "You're in Town Full of Thieves"</i>			
314	11/24/09	<u>Miami Herald</u> . <i>Feds: Scott Rothstein Ponzi Scheme Paid Salaries at Law Firm</i>			
315	11/26/09	<i>The Rothstein Wires</i>			
316	1/13/10	<u>Sun Sentinel</u> . <i>Florida Bar Looking at 35 Former Attorneys from Rothstein's Firm</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
317	July 2010	<u>Sun Sentinel</u> . <i>22 Former Scott Rothstein Attorneys Cleared by the Florida Bar</i>			
318	10/22/10	<u>South Florida Business Journal</u> . <i>A Year After Rothstein, Many Questions Unanswered</i>			
319	10/31/10	<u>The Florida Bar</u> . <i>Scott Rothstein Scandal: One Year Later</i>			
320	1/21/13	<u>Forbes</u> . <i>Rothstein Expose Details Sex, Murder, and Corruption Behind Florida's Largest Ponzi Scheme</i>			
321	10/13/14	<i>Five Years on, Rothstein's Ponzi Still Resonates</i>			
322	10/3/17	<u>Palm Beach Daily News</u> . <i>Epstein Paid Three Women \$5.5 Million to End Underage Sex Lawsuits</i>			
General					
323		All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party			
324		All court dockets and filings in all matters against Jeffrey Epstein relating to any victim's claims			
325		All prior testimony, statements, reports and affidavits of any witness or experts			
326		All charts/analyses prepared based on documents exchanged or later discovered			
327		All foundation exhibits			
328		All rebuttal and impeachment exhibits			
329		Demonstrative aids and exhibits including, but not limited to, charts, timelines, diagrams, models, surveys, photographs and blow-ups			
330		All newly discovered documents/exhibits			
331		Any and all exhibits listed by Bradley J. Edwards (by identifying these as exhibits, Plaintiff is not waiving his right to object to any of Edwards' exhibits introduced at trial)			

Plaintiff/Counter-Defendant reserves his right to supplement this Exhibit List.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 16, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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By: /s/ Scott J. Link

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*Trial Counsel for Plaintiff/Counter-Defendant
Jeffrey Epstein*

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<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 tonja@tonjahaddad.com efiling@tonjahaddad.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad & Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 dee@haddadandnavarrolaw.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	

NOT A CERTIFIED COPY

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

**OBJECTIONS TO COUNTER-DEFENDANT JEFFREY EPSTEIN'S
AMENDED EXHIBIT LIST**

Bradley J. Edwards, by and through his undersigned counsel, files his Objections to Counter-Defendant Jeffrey Epstein's Amended Exhibit List dated November 16, 2017, as follows:

INDEX TO OBJECTIONS

- | | |
|---|---|
| 0. No Objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed
by danger of unfair prejudice, confusion of issues,
misleading the jury, or needless presentation of
cumulative evidence | 9. Other (please identify basis of objection) |

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards and L.M. 15th Judicial Circuit Case No. 50-2009-CA-040800XXXXMB					
1	12/7/09	Complaint with Exhibits	0		
2	12/21/09	Answer and Counterclaim of Defendant Bradley J. Edwards	0		
3	1/21/10	Default against Scott Rothstein	0		
4	8/2/10 8/9/10	Stipulation and Order of Dismissal with Prejudice as to L.M., Individually Only	0		
5	3/27/12	Notice of Appearance of Bradley J. Edwards	0		
6	8/16/12	Notice of Voluntary Dismissal Without Prejudice of Bradley J. Edwards	0		
7	1/9/13	Bradley J. Edwards' Fourth Amended Counterclaim	0		
8	9/25/13	Affidavit of Jeffrey Epstein	1		
9	6/30/17	Affidavit of Jeffrey Epstein	1		
10	6/30/17	Jeffrey Epstein's Motion for Summary Judgment, Appendix in Support and all documents cited therein	1		
11	Misc.	All deposition transcripts, exhibits and videotapes including, but not limited to: a. Bradley J. Edwards (3/23/10; 5/15/13; 10/10/13; 11/10/17) b. Jeffrey Epstein (3/17/10; 1/25/12) c. Scott Rothstein (6/14/12) d. Russell Adler (4/20/11) e. Abrakas Joseph Discala (5/25/11) f. Dean Russell Kretschmar (2/11/11) g. Michael Legamaro (3/11/11) h. Courtney Wild (10/12/17)	2		
12	Misc.	Defendant/Counter-Plaintiff Bradley J. Edwards' Answers, Responses, Objections and Privilege Logs in response to Plaintiff/Counter-Defendant Jeffrey Epstein's Interrogatories, Requests for Admission, Requests for Production, and Subpoenas Duces Tecum	2		
13	Misc.	All documents produced by any party or non-party in this matter	1		
14	Misc.	All documents filed in the court file, including pleadings, motions, responses, affidavits, discovery, and exhibits	1		
15	Misc.	All hearing transcripts	1		
State of Florida v. Jeffrey Epstein 15th Judicial Circuit					

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
16	4/24/07	Transcript of Taped Statement of Tatum Miller	1		
17	Misc.	All other testimony, transcripts and statements provided in the matter	1		
<i>L.M. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028051XXXXMB					
18	Misc.	Court docket and all court filings referenced therein	1		
19	9/11/08	Complaint	0		
20	12/23/08	Amended Complaint	0		
21	3/30/09	Notice of Change of Firm and Address	0		
22	4/7/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint	0		
23	8/19/09 9/11/09	Notices of Production from Non Parties: (1) Stephen Alexander, M.D.; (2) Bruce W. Markowitz, M.D.; and (3) Charles J. Galecki, M.D.	2		
24	8/24/09	Notices of Taking Deposition and Subpoenas to (1) Lawrence Paul Visoski, Jr. and (2) David Hart Rogers	2		
25	8/11/09	Plaintiff's Request for Production to Defendant	2		
26	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint	0		
27	5/28/10	Plaintiff's Third Amended Complaint	2		
28	7/22/10	Stipulation of Dismissal With Prejudice	2		
29	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. L.M. (9/24/09; 2/9/10)	1		
<i>L.M. v. Jeffrey Epstein</i> USDC S.D. Fla. Case No. 09-CV-81092					
30	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	2		
31	7/24/09	Complaint and Demand for Jury Trial	0		
32	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 21)	3, 4, 7		
33	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
34		Federal Rule of Civil Procedure, Rule 11	2		
<i>E.W. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028058XXXXMB					
35	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
36	9/10/08	Complaint	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
37	12/23/08	Amended Complaint	0		
38	3/30/09	Notice of Change of Firm and Address	0		
39	4/6/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint	0		
40	6/2/09	Defendant Epstein's Motion for Order to Terminate or Limit Deposition and Response in Opposition to Plaintiff's Amended Motion to Compel for Sanctions	3, 4, 7, 8		
41	7/16/09	Cross Notice of Taking Videotaped Deposition of Alfredo Rodriguez	0		
42	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint	0		
43	8/10/09	Plaintiff's Request for Entry Upon Land	0		
44	5/28/10	Plaintiff's Third Amended Complaint	3, 4, 7, 8		
45	7/22/10	Stipulation of Dismissal With Prejudice	3, 4, 7, 8		
46	7/29/10	Order Adopting Stipulation and Dismissing Case With Prejudice	3, 4, 7		
47	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. E.W. (5/6/10)	1		
<p align="center">Jane Doe v. Jeffrey Epstein USDC S.D. Fla. Case No. 08-CV-80893</p>					
48	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
49	8/12/08	Complaint (D.E. 1)	0		
50	3/26/09	Defendant Epstein's Motion to Stay and/or Continue Action for Time Certain Based on Parallel Civil and Criminal Proceedings with Incorporated Memorandum of Law (D.E. 24)	3, 4, 7, 8		
51	4/9/09	Notice of Change of Address and Firm Affiliation (D.E. 30)	0		
52	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorney's from Revealing Provisions in the Agreement (D.E. 32)	0		
53	4/17/09	Plaintiff's First Amended Complaint (D.E. 38)	0		
54	5/14/09	Order Consolidating Cases for Purposes of Discovery and Procedural Motions that Relate to Multiple Cases (D.E. 56)	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
55	7/28/09 to 10/22/09	Notices of Taking Deposition and Subpoenas to: Ghislane Noelle Maxwell, Leslie Wexler, Donald Trump, Mark Epstein, Nadia Marcinkova, Jean Luc Bruhel, Sarah Kellen, Michael Freidman, Rosalie Freidman, and Michael Sanka	0		
56	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 210)	3, 4, 7, 8		
57	7/20/10	Final Order of Dismissal With Prejudice (D.E. 211)	3, 4, 7, 8		
58	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
<i>Jane Doe 2 v. Jeffrey Epstein (Consolidated Action)</i> USDC S.D. Fla. Case No. 08-CV-80119					
59	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
60	6/19/09	Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165)	0		
61	7/23/09	Plaintiff Jane Doe's Reply Memorandum in Support of Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 217)	0		
62	10/16/09	Plaintiff Jane Doe's Notice that Additional Evidence of Epstein's Fraudulent Asset Transfers Will be Filed Shortly, etc. (D.E. 357)	0		
63	10/30/09	Plaintiff Jane Doe's Motion for Leave to Provide Recently-Obtained Deposition Testimony and Affidavit Demonstrating Fraudulent Transfers by Epstein in Support of Motion for Appointment of a Receiver to Take Charge of Property of Epstein and Incorporated Supporting Memo of Law (D.E. 386)	0		
64	11/5/09	Order (D.E. 400)	3, 4, 7		
65	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
<i>Jane Doe v. United States of America (CVRA)</i> USDC S.D. Fla. Case No. 08-80736-CIV					
66	7/7/08	Emergency Victim's Petition for Enforcement of Crime Victim's Rights Act, 18 U.S.C. Section 3771 (D.E. 1)	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
67	8/14/08	Transcript of Hearing Before the Honorable Kenneth A. Marra	3, 4, 7, 8		
<i>Rothstein Rosenfeldt Adler and Stuart Rosenfeldt v. Scott W. Rothstein</i> 17th Judicial Circuit Broward County Case No. 2009-CA-059301-AXXXCE					
68	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
69	11/3/09	Amended Complaint	3, 4, 7, 8		
70	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
<i>In re Rothstein Rosenfeldt Adler, P.A.</i> USBC S.D. Fla. Case No. 09-34791-RBR					
71	11/16/09	Motion of the U.S. Trustee for an Order Directing the Appointment of a Chapter 11 Trustee and Objection to Retention of Chief Restructuring Officer (D.E. 8)	3, 4, 7, 8		
72	12/1/09	Verified Complaint for Damages and Other Relief (D.E. 74)	3, 4, 7, 8		
73	2/23/11	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman	3, 4, 7, 8		
74	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein (12/12/11); b. Jack (John) Scarola's (7/2/13); and c. Russell Adler (10/28/10).	1		
<i>United States of America v. Scott Rothstein – Forfeiture Action</i> USDC S.D. Fla. Case No. 09-CV-61780-Zloch-Rosenbaum					
75	11/9/09	Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 1)	3, 4, 7, 8		
76	11/23/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 14)	3, 4, 7, 8		
77	11/27/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 19)	3, 4, 7, 8		
<i>The Florida Bar Matters</i>					
78	11/9/09	The Florida Bar Inquiry/Complaint Form Jeffrey Epstein filed against Bradley J. Edwards, William Berger and Scott Rothstein	0		
79	11/25/09	Approval of Scott Rothstein's disbarment; <i>The Florida Bar v. Scott Walter Rothstein</i> ; Supreme Court Case No. SC09-2146	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
80	6/24/10	The Florida Bar's Notice of No Probable Cause and Letter of Advice to Accused; <i>In re Complaints by Jeffrey Epstein and the Florida Bar against Bradley James Edwards</i> ; Case No. 2010-50,746(09B)	0		
United States of America v. Scott W. Rothstein USDC S.D. Fla. Case No. 09-60331					
81	12/1/09	Information charging Scott W. Rothstein	3, 4, 7, 8		
82	1/25/10	Plea Agreement between the United States of America and Scott W. Rothstein	3, 4, 7, 8		
83	9/26/17	Government's Motion to Withdraw its Motion for Reduction of Sentence	3, 4, 7, 8		
Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al. 17th Judicial Circuit, Broward County, Florida Case No. 09-062943					
84	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
85	11/20/09	Complaint	3, 4, 7, 8		
86	11/25/09	Amended Complaint	3, 4, 7, 8		
87	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein's testimony (12/12/11, 12/19/11, 12/20/11, 12/21/11, 12/22/11)	1		
Rothstein Rosenfeldt Adler – Communication					
88	4/8/09 2:58 p.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Mark S. Nurik (01404)	1		
89	4/22/09 4:51 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01620)	3, 4, 5, 8		
90	4/24/09 5:07 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01446)	3, 4, 5, 8		
91	5/19/09 10:33 a.m.	E-mail from William J. Berger to Bradley J. Edwards, Russell Adler, Steven R. Jaffe, Matthew D. Weissing and Gary M. Farmer (01726)	1		
92	5/19/09 12:00 p.m.	E-mail from Susan K. Stirling to Bradley J. Edwards (05725)	1		
93	5/19/09 12:03 p.m.	E-mail from Bradley J. Edwards to Russel Adler (01574)	3, 4, 5, 8		
94	5/22/09 12:13 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01449)	3, 4, 5, 8		
95	5/22/09 12:21 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05148)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
96	5/26/09 4:57 p.m.	E-mail from Bradley J. Edwards to Timothy Malloy (01450)	3, 4, 5, 8		
97	5/26/09 5:33 p.m.	E-mail from Timothy Malloy to Bradley J. Edwards (05151)	1		
98	5/28/09 2:13 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05161)	1		
99	5/28/09 2:16 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02241-02242)	3, 4, 5, 8		
100	6/3/09 5:17 p.m.	E-mail from William J Berger to Grace Torres, cc Russell Adler and Bradley J. Edwards (01735)	1		
101	6/4/09 10:43 a.m.	E-mail from Bradley J. Edwards to Susan K. Stirling, cc Carla Martinez (01410)	3, 4, 5, 8		
102	6/9/09 3:10 p.m.	E-mail from Bradley J. Edwards to Eric Glasser (06655)	3, 4, 5, 8		
103	6/23/09 12:52 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (Palm Beach Daily News) (01632)	3, 4, 5, 8		
104	6/23/09 1:03 p.m.	E-mail from Bradley J. Edwards to Paul Cassell (01634)	3, 4, 5, 8		
105	6/23/09 1:13 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05239)	1		
106	6/23/09 1:16 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05203)	3, 4, 5, 8		
107	6/23/09 1:29 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05277-05278)	1		
108	6/23/09 2:31 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05207-05208)	3, 4, 5, 8		
109	6/23/09 2:41 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05324-05325)	1		
110	6/23/09 2:53 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05212-05213)	3, 4, 5, 8		
111	6/23/09 3:08 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05344-05346)	1		
112	6/23/09 3:12 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05215-05217)	3, 4, 5, 8		
113	6/23/09 4:39 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05368-05369)	1		
114	6/23/09 5:22 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05220-05221)	3, 4, 5, 8		
115	6/23/09 5:28 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05387-05388)	1		
116	6/24/09 9:39 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (05224-05225)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
117	7/8/09 3:36 p.m.	E-mail from Bradley J. Edwards to Russell Adler, William J. Berger and Steven R. Jaffee (01462)	3, 4, 5, 8		
118	7/13/09 2:28 p.m.	E-mail from Michele Dargan (Palm Beach Daily News) to Bradley J. Edwards (08404)	1		
119	7/4/09 4:37 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02204)	3, 4, 5, 8		
120	7/15/09 1:17 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (04906)	3, 4, 5, 8		
121	7/15/09 1:22 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (04905)	1		
122	7/18/09 4:10 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01661)	3, 4, 5, 8		
123	7/21/09 8:21 p.m.	E-mail from Bradley J. Edwards to Michele Leone (01352)	3, 4, 5, 8		
124	7/22/09 11:22 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01479)	3, 4, 5, 8		
125	7/22/09 11:35 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05803)	1		
126	7/22/09 1:29 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards (01662)	1		
127	7/22/09	Letter from Bradley J. Edwards re cross noticing depositions	3, 4, 5, 8		
128	7/26/09 5:28 p.m.	E-mail from Priscila A. Nascimento to Scott Rothstein, cc Amy N. Howard and Adelita Cabello (25860-25863)	1		
129	7/28/09 8:59 a.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01483)	3, 4, 5, 8		
130	7/28/09 8:59 a.m.	E-mail from Susan Spencer Wendel to Bradley J. Edwards (03070)	1		
131	7/28/09 9:28 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01486)	3, 4, 5, 8		
132	7/28/09 10:00 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05848)	1		
133	7/29/09 1:13 p.m.	E-mail from Cara L. Holmes to Bradley J. Edwards (08420)	1		
134	7/28/09 1:47 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (11075-11076)	1		
135	7/29/09 1:49 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05852-05853)	1		
136	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05535-05536)	3, 4, 5, 8		
137	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (11320-11322)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
138	7/30/09 6:06 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05538-05539)	3, 4, 5, 8		
139	7/31/09 11:20 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (11080-11082)	1		
140	8/10/09 6:59 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06965)	3, 4, 5, 8		
141	8/10/09 7:23 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06967)	1		
142	8/11/09 8:43 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06968-06969)	3, 4, 5, 8		
143	8/11/09 9:29 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06963-06964)	1		
144	8/11/09 10:10 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06970-06971)	3, 4, 5, 8		
145	8/11/09 12:34 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06959-06960)	1		
146	8/14/09 4:40 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06975)	1		
147	8/15/09 2:41 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Ken Jenne (01685)	3, 4, 5, 8		
148	8/15/09 6:00 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06972-06973)	3, 4, 5, 8		
149	8/17/09 10:32 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06976-06977)	1		
150	8/17/09 10:42 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (02442)	3, 4, 5, 8		
151	8/19/09 2:47 p.m.	E-mail from Bradley J. Edwards to Ken Jenne (01501)	3, 4, 5, 8		
152	8/24/09 7:38 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (01506)	3, 4, 5, 8		
153	8/25/09 11:03 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (05952-05953)	1		
154	8/26/09 9:56 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (02269)	3, 4, 5, 8		
155	8/31/09 10:58 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02895)	1		
156	9/2/09 12:54 p.m.	E-mail from Elizabeth Villar to Bradley J. Edwards and Ken Jenne, cc Jacquie Johnson, Pat Roberts and Mike Fisten (01376)	1		
157	9/7/09 1:39 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07612-07613)	1		
158	9/7/09 6:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02595-02596)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
159	9/7/09 6:49 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07614-07615)	3, 4, 5, 8		
160	9/7/09 7:00 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07605-07606)	1		
161	9/7/09 8:12 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07607-07608)	3, 4, 5, 8		
162	9/7/09 10:55 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07609-07611)	1		
163	9/8/09 11:43 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04015)	3, 4, 5, 8		
164	9/8/09 11:50 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07646)	1		
165	9/8/09 11:53 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07647)	3, 4, 5, 8		
166	9/8/09 12:04 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07676-07677)	1		
167	9/8/09 1:59 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07674-07675)	1		
168	9/8/09 2:04 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07678-07679)	3, 4, 5, 8		
169	9/8/09 2:36 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07684-07685)	1		
170	9/8/09 2:42 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07682-07683)	3, 4, 5, 8		
171	9/8/09 2:49 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07695-07697)	1		
172	9/8/09 3:25 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07680-07681)	1		
173	9/8/09 7:51 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07686-07688)	3, 4, 5, 8		
174	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07689-07691)	1		
175	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07692-07694)	1		
176	9/15/09 1:08 p.m.	E-mail from Bradley J. Edwards to Elizabeth Villar, cc Ken Jenne and Pat Roberts (01361)	3, 4, 5, 8		
177	9/18/09 12:35 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01318)	3, 4, 5, 8		
178	9/18/09 12:35 p.m.	E-mail from Jacquie Johnson to Ann Marie Villafana, cc Bradley J. Edwards (01583)	1		
179	9/18/09 1:01 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (05619-05620)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
180	9/18/09 2:37 p.m.	E-mail from Bradley J. Edwards to Beth S. Williamson (01144)	3, 4, 5, 8		
181	9/18/09 2:55 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (01280-01288)	3, 4, 5, 8		
182	9/21/09 1:37 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03081)	1		
183	9/23/09 8:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04320)	1		
184	9/24/09 6:31 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04321)	3, 4, 5, 8		
185	9/24/09 6:53 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04318-04319)	1		
186	9/24/09 8:45 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (10586-10589)	1		
187	9/28/09 8:09 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards, cc Renee/Carlos Morrison (02913)	1		
188	9/28/09 10:06 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (06789)	3, 4, 5, 8		
189	9/28/09 10:20 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (06788)	1		
190	9/28/09 11:45 p.m.	E-mail from Mike Fisten to Conchita Sarnoff (19986-19987)	1		
191	9/29/09 10:06 a.m.	E-mail from Bradley J. Edwards to Ken Jenn and Elizabeth Villar (01754)	3, 4, 5, 8		
192	10/2/09 10:41 a.m.	E-mail from Bradley J. Edwards to Nigel Rosser (06191)	3, 4, 5, 8		
193	10/2/09 11:08 a.m.	E-mail from Nigel Rosser to Bradley J. Edwards (06189-06190)	1		
194	10/2/09 4:28 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06979-06980)	1		
195	10/2/09 4:52 p.m.	E-mail from Bradley J. Edwards to Mike Fisten (02440-02441)	3, 4, 5, 8		
196	10/2/09 4:53 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff, cc Jacquie Johnson (06974)	3, 4, 5, 8		
197	10/2/09 6:14 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards, cc Jacquie Johnson (06955-06956)	1		
198	10/8/09 4:11 p.m.	E-mail from Bradley J. Edwards to Richard Johnson (06961)	3, 4, 5, 8		
199	10/13/09 2:17 p.m.	E-mail from Grant J. Smith to Scott Rothstein, Bradley J. Edwards, Ken Jenne, Kip Hunter and Russell Adler, cc Grant J. Smith (26507)	1		
200	10/13/09 2:27 p.m.	E-mail from Mike Fisten to Bradley J. Edwards (01727)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
201	10/13/09 7:00 p.m.	E-mail from Bradley J. Edwards to Jacquie Johnson, cc Mike Fisten (01744)	3, 4, 5, 8		
202	10/14/09 7:39 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (03190)	3, 4, 5, 8		
203	10/14/09 9:02 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03189)	1		
204	10/14/09 10:42 a.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Jacquie Johnson (01099)	1		
205	10/14/09 12:20 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Jacquie Johnson (01741)	3, 4, 5, 8		
206	10/16/09 5:29 a.m.	E-mail from ABA Journal Weekly Newsletter to Scott Rothstein (25864-25865)	1		
207	10/19/09 10:46 a.m.	E-mail from Bradley J. Edwards to Ken Jenne (01704)	3, 4, 5, 8		
208	10/20/09 1:01 p.m.	E-mail from George Rush to Bradley J. Edwards (01433)	1		
209	10/20/09 3:07 p.m.	E-mail from Ken Jenne to Scott Rothstein (26506)	1		
210	10/22/09 11:52 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (01391)	3, 4, 5, 8		
211	10/22/09 2:52 p.m.	E-mail from Jacquie Johnson to Russell Adler, Cara L. Holmes, Mike Fisten, Michael J. Wheeler, Marc S. Nurik, William J. Berger, Bradley J. Edwards, Barry J. Stone and Ken Jenne, cc Robert C. Buschel (01392)	1		
212	10/22/09 4:10 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards, Marc S. Nurik, Michael J. Wheeler, Cara L. Holmes, William J. Berger, Russell Adler and Robert C. Buschel (01307)	1		
213	10/26/09 7:46 a.m.	E-mail from William J. Berger to Pat Carter and Bradley J. Edwards, cc Grace Torres and Jacquie Johnson (01380)	1		
214	10/29/09 2:16 p.m.	E-mail from Pat Diaz to Bradley J. Edwards (01623)	1		
215	10/30/09 10:01 a.m.	E-mail from Debra Villegas to Scott Rothstein (26304-26305)	1		
216	10/30/09 10:03 a.m.	E-mail from Russell Adler to Jacquie Johnson and Bradley J. Edwards (01625)	1		
Billing					
217	12/21/09	Contract for Services between Searcy Denny Scarola Barnhart & Shipley and Bradley J. Edwards	2		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
218	N/D	Spreadsheet of Brad Edwards' Time in <i>Edwards adv. Epstein</i> (BJE00000104 – BJE00000156)	0		
219	7/14/10 - 1/16/13	Searcy Denney Scarola Barnhart and Shipley's Invoices for Disbursements to Bradley J. Edwards (BJE000000039 – BJE000000103)	2		
220	1/1/80 – 2/15/13	Searcy Denney Scarola Barnhart and Shipley's Matter Ledger Report (BJE0000000006 – BJE0000000038)	2		
Miscellaneous					
221	10/23/09	Rothstein Rosenfeldt Adler's Firm Directory	3, 7, 8		
222	11/9/17	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s "Our Attorneys" website printout (https://www.pathtojustice.com/about-us/attorneys/)	3, 4, 7, 8		
223	12/1/09	Criminal Complaint; <i>United States of America v. Alfredo Rodriguez</i> ; USDC S.D. Fla. Case No. 098308	3, 4, 7, 8		
224	4/23/10	Affidavit of Bradley James Edwards	0		
225	9/21/10	Affidavit of Bradley James Edwards	0		
226	Misc.	Subpoenas and Notices of Deposition for Alan Dershowitz, David Copperfield and Leonard Baird	3, 4, 7, 8		
227	11/16/17	Critton Luttier Coleman, LLP's website printout for Robert D. Critton Jr. (https://www.lawclc.com/team_members/Robert-d-critton-jr/)	3, 4, 7, 8		
228	11/16/17	Fowler White Burnett, P.A.'s website printout for Joseph L. Ackerman, Jr. (http://www.fowler-white.com/Attorneys/id/3/read)	3, 4, 7, 8		
Bradley J. Edwards					
229	N/D	The National Crime Victim Bar Association presentation excerpt of article by Bradley J. Edwards: <i>Who is Responsible for Child Sexual Abuse</i>	3, 4, 8		
230	N/D	The Florida Bar's website member profile printout for Bradley James Edwards	7, 8		
231	N/D	National Association of Distinguished Counsel biographical information for Bradley J. Edwards	7, 8		
232	5/14/13	The National Trial Lawyers Top 40 Under 40 Directory (http://www.thenationaltriallawyers.org/top-40-under-40-directory/?last_name+Edwards&city=&state=FL&)	7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
233	5/14/13	The National Trial Lawyers Profile View of Brad Edwards (http://www.thenationaltriallawyers.org/profile-view/Brad/Edwards/4409/)	7, 8		
234	5/14/13	Lawyers.com website information for Bradley J. Edwards (http://www.lawyers.com/florida/fort-lauderdale/Bradley-J-Edwards-3489098-a/)	7, 8		
235	10/30/04	Kubicki Draper's website attorney information for Brad J. Edwards	3, 7, 8		
236	10/30/05	Kubicki Draper's website attorney information for Brad J. Edwards	3, 7, 8		
237		The American Registry Website printouts of recognitions received by Bradley J. Edwards	7, 8		
238	5/7/12	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)	7, 8		
239	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)	7, 8		
240	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/press-releases/)	7, 8		
241	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. website printout (http://www.abuseandassault.com/Abuse	7, 8		
242	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Notable_Cases)	7, 8		
243	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards (www.pathtojustice.com/attorneys/brad-	7, 8		
244	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/achived-press-	7, 8		
245		Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards with referenced articles	7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
A.	Winter 2014	Journal of Criminal Law and Criminology. Volume 104; Issue 1. <i>Crime Victims' Rights During Criminal Investigations? Applying the Crime Victims' Rights Act Before Criminal Charges are Filed;</i>	3, 7, 8		
B.	12/26/15	Politico. <i>Victims in Underage Sex Case Want Prosecutors to Testify</i>	3, 4, 7, 8		
C.	12/21/15	Palm Beach Daily News. <i>Jeffrey Epstein Sex Scandal: Alan Dershowitz Suffers Setback in Defamation Case</i>	3, 4, 7, 8		
D.	12/18/15	Palm Beach Daily News. <i>Epstein Victims' Attorneys Seek Partial Victory in Defamation Suit</i>	3, 4, 7, 8		
E.	12/21/15	Palm Beach Post. <i>Boca-Resident Model Nabs \$13.4 Million Following Six-Year Divorce Battle</i>	3, 4, 7, 8		
F.	12/17/15	Daily Mail.Com. <i>Florida Model Gets Whopping \$13.4 Million Payout from Real Estate Tycoon Ex-Husband After Nasty Six-Year Divorce Battle</i>	3, 4, 7, 8		
G.	11/25/15	Palm Beach Daily News. <i>Appellate Court Reverses Palm Beach Sex Offender Jeffrey Epstein's Victory</i>	3, 4, 7, 8		
H.	11/12/15	Daily Business Review. <i>Attorney's Suit Against Billionaire Allowed as Long as Justices Say It's OK</i>	3, 4, 7, 8		
I.	7/8/15	Palm Beach Daily News. <i>Judge Keeps Thousands of Epstein Documents Sealed</i>	0		
J.	6/25/15	WCVB5. <i>Jury Awards \$24 Million to Mass. Widower in Fatal Cabana Crash</i>	3, 4, 7, 8		
K.	6/24/15	NBC6. <i>Jury Awards 24 Million in Fatal Cabana Crash</i>	3, 4, 7, 8		
L.	6/24/15	CBS Miami. <i>Jury Awards Millions to Husband of Pregnant Woman Killed by Drunk Driver</i>	3, 4, 7, 8		
M.	6/25/15	Sun Sentinel. <i>Jury Awards \$24 Million to Widower in Fatal Cabana Crash</i>	3, 4, 7, 8		
N.	1/8/15	Daily Business Review. <i>The Lawyer Suing Legal Legend Alan Dershowitz Over Sex Offender</i>	3, 4, 7, 8		
O.	4/21/14	The Washington Post. <i>Eleventh Circuit Rules that Discovery Can Move Forward on My Crime Victims' Rights Act Case</i>	3, 4, 7, 8		
P.	4/21/14	Palm Beach Daily News. <i>Appeals Court Rules Against Sex Offender. Attorneys for Underage Victims Seek to Overturn "Sweetheart Plea"</i>	3, 4, 7, 8		
Q.	4/21/14	Sun-Sentinel. <i>Victims Win Right to See Negotiation that Led to 'Lenient' Plea Deal Agreement for Billionaire Sex Offender</i>	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
R.	4/21/14	Palm Beach Post. <i>Appellate Ruling Could Force Feds to Reconsider Sex Changes Against Palm Beacher Epstein</i>	3, 4, 7, 8		
S.	10/20/13	Palm Beach Daily News. <i>Newest Lawsuit Against Epstein Expected to Include Victim Testimony</i>	0		
T.	9/10/12	CBS Miami, <i>Exclusive: Sexual Assault Victim Alleges Abuse by Former Youth Pastor</i>	3, 4, 7, 8		
U.	9/7/12	Sun-Sentinel. <i>Elevator Fall Nets Woman \$13 Million Jury Award</i>	3, 4, 7, 8		
V.	July 2012	Daily Business Review. <i>Top Florida Verdicts & Settlements of 2011</i>	3, 4, 7, 8		
W.	6/13/12	Daily Business Review. <i>Suit Accuses Goldrush Strip Club of Scheme to Bilk Professionals</i>	3, 4, 7, 8		
X.	4/22/11	Palm Beach Daily Business Review. <i>Jeffrey Epstein Amends Lawsuit; Claims Victims' Attorney Threatened to Depose His Friends</i>	3, 4, 7, 8		
246	8/10/16	Farmer Jaffe Weissing's Facebook page with referenced articles	3, 4, 7, 8		
A.	5/22/16	Lawnewz.com. <i>The Shameful Way Feds Protected Convicted Pedophile Billionaire Jeffrey Epstein</i>	0		
B.	5/13/16	Fox News. <i>Flight Logs Show Bill Clinton Flew on Sex Offender's Jet Much More than Previously Known</i>	0		
C.	2/11/16	Sun-Sentinel. <i>Feds Deceived Us About Billionaire Sex Offender's 'Sweetheart Deal' Teen Victims Say</i>	0		
D.	2/12/16	NBC News. <i>Lawyers: Victims Not Told of 'Sweetheart Deal' for Jeffrey Epstein</i>	0		
E.	2/11/16	NY Daily News. <i>Jeffrey Epstein Accusers Sue Feds Over Hidden Non-Prosecution 'Conspiracy'</i>	0		
F.	4/23/14	Farmer, Jaffe. <i>Appeals Court Rules in Favor of Crime Victims' Rights in Registered Pedophile Jeffrey E. Epstein Case</i>	3, 4, 7, 8		
G.	4/23/14	Daily Business Review. <i>Prosecutors Must Turn Over Docs in Billionaire Sex Offender Jeffrey Epstein Case</i>	0		
247	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Court, Case No. 16-1995-MM-000074-AXXA-MA	1		
248	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Case No. 16-1998-CF-004394-AXXX-MA	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
249	8/14/07	Exemption and/or Limitation Exclusion – Tax Assessment of \$3,507.72	1		
250	1/7/08	Notice of Satisfaction of Lien Relative to Tax Exemption	1		
251	Misc.	Docket and all court filings referenced therein; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
252	1/21/10	Petition/Complaint; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
253	2/18/10	Bradley J. Edwards' Answer and Affirmative Defenses; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
254	8/11/10	Notice of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
255	8/11/10	Final Summary Judgment of Mortgage Foreclosure; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
256	10/22/10	Certificate of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
257	11/2/10	Certificate of Title; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
258	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
259	3/17/10	Petition/Complaint; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
260	10/4/11	Final Summary Judgment of Mortgage Foreclosure; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
261	10/10/11	Notice of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
262	1/5/12	Certificate of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
263	1/18/12	Certificate of Title; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
264	Misc.	Docket and all court filings referenced therein; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-	1		
265	12/8/11	Complaint; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427	1		
266	1/25/12	Stipulation for Settlement; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427	1		
267	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
268	3/22/12	Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
269	5/18/12	Bradley J. Edwards' Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
270	10/3/12	Order Denying Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
271	10/26/12	Answer to Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
272	11/20/12	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
273	3/15/13	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
274		Corporate Detail Printout from Sunbiz.org for The Law Office of Brad Edwards & Associates, LLC	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
275	4/16/07	Articles of Organization for Florida Limited Liability Company for The Law Office of Brad Edwards & Associates, LLC	1		
276	1/25/08	2008 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates	1		
277	3/11/09	2009 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates	1		
278		Florida Bar Rules including, but not limited to, Florida Bar Rule 4-7.21	1		
279	3/3/08	Complaint; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 1)	1		
280	6/17/08	Omnibus Order on Defendants' Motion to Dismiss; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 79)	1		
281	8/10/10	U.S. Court of Appeals Opinion; <i>Donald D. Baker v. City of Hollywood, et al.</i> ; Case No. 08-14924 & 08-15602	1		
282	12/9/04	New Times Broward Palm-Beach: <i>Tale of the Tape</i>	1		
Experts					
283	10/20/17	Dr. Bernard J. Jansen's Expert Report with attachments	0		
284	Misc.	All documents produced, or relied upon or referenced by Dr. Bernard J. Jansen in preparing his 10/20/17 Report	0		
285	9/9/16	Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)	1		
286	11/30/16	Supplemental Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)	1		
287	Misc.	All public records, news articles and prior testimony of Dr. Bernard J. Jansen	1		
Other Articles					
288	11/1/09	<i>Kendall Coffey: Law Firm Victimized by Scott Rothstein</i>	3, 4, 7, 8		
289	11/2/09	Legal Junkies. <i>WSJ Law Blog – Rothstein Rosenfeldt Adler, Ft. Lauderdale, Law Firm Dissolution, Ponzi Scheme</i>	3, 4, 7, 8		
290	11/2/09	New Times Broward-Palm Beach. <i>Chief Judge: Scott Rothstein's Firm Has "No Money" and is Going into Receivership</i>	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
291	11/3/09	The New York Times: <i>Fraud Accusations Against Florida Lawyer Set Off a Race to Return His Donations</i>	3, 4, 7, 8		
292	11/3/09	Rothstein Returns After Contemplating Suicide, Partner Says	3, 4, 7, 8		
293	11/3/09	Florida Law Firm Asks to be Dissolved	3, 4, 7, 8		
294	11/3/09	Sun Sentinel. Scott Rothstein's Investment Deals Seemed Too Good to be True	3, 4, 7, 8		
295	11/5/09	Funds News. FBI Agents Search Law Firm in Missing Funds Probe	3, 4, 7, 8		
296	11/6/09	New Times Broward-Palm Beach. Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy	3, 4, 7, 8		
297	11/6/09	Rothstein Accomplice Still on Lam	3, 4, 7, 8		
298	11/7/09	Tour of Scott Rothstein's Office Reveals Gallery of Who's Who	3, 4, 7, 8		
299	11/12/09	Sun Sentinel: FBI Doubts Rothstein Ran a Ponzi Scheme Alone	3, 4, 7, 8		
300	11/13/09	Palm Beach Post: FBI Doubts Rothstein's Scheme a 'One-Man Show'	3, 4, 7, 8		
301	11/13/09	Sun Sentinel. High-Ranking Police Officers Guarded Over Rothstein	3, 4, 7, 8		
302	11/17/09	Inside the Rothstein Swindle, Part I	3, 4, 7, 8		
303	11/17/09	Sun Sentinel. Rothstein Asks to Voluntarily Give Up Law License	3, 4, 7, 8		
304	11/17/09	Rothstein and Dreier: How Much Alike?	3, 4, 7, 8		
305	11/18/09	Inside the Rothstein Swindle, Part II	3, 4, 7, 8		
306	11/18/09	Former RAA Attorneys Take New Jobs	3, 4, 7, 8		
307	11/20/09	Scherer Files Suit Against Rothstein, et al.	3, 4, 7, 8		
308	11/20/09	Article by Paul Brinkman	3, 4, 7, 8		
309	11/21/09	Rothstein Feeder George Levin's Ugly Past	3, 4, 7, 8		
310	11/22/09	George Levin was Rothstein's Whale	3, 4, 7, 8		
311	11/23/09	Rothstein Associate Levy Got Protection from Plantation Cops	3, 4, 7, 8		
312	11/23/09	Main Line Firm's Clients Invested \$30 Million with 'Ponzi' Lawyer	3, 4, 7, 8		
313	11/23/09	Sun-Sentinel. Scott Rothstein: "You're in Town Full of Thieves"	3, 4, 7, 8		
314	11/24/09	Miami Herald. Feds: Scott Rothstein Ponzi Scheme Paid Salaries at Law Firm	3, 4, 7, 8		
315	11/26/09	The Rothstein Wires	3, 4, 7, 8		
316	1/13/10	Sun Sentinel. Florida Bar Looking at 35 Former Attorneys from Rothstein's Firm	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
317	July 2010	Sun Sentinel. <i>22 Former Scott Rothstein Attorneys Cleared by the Florida Bar</i>	3, 4, 7, 8		
318	10/22/10	South Florida Business Journal. <i>A Year After Rothstein, Many Questions Unanswered</i>	3, 4, 7, 8		
319	10/31/10	The Florida Bar. <i>Scott Rothstein Scandal: One Year Later</i>	3, 4, 7, 8		
320	1/21/13	Forbes. <i>Rothstein Expose Details Sex, Murder, and Corruption Behind Florida's Largest Ponzi Scheme</i>	3, 4, 7, 8		
321	10/13/14	<i>Five Years on, Rothstein's Ponzi Still Resonates</i>	3, 4, 7, 8		
322	10/3/17	Palm Beach Daily News. <i>Epstein Paid Three Women \$5.5 Million to End Underage Sex Lawsuits</i>	0		
General					
323		All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party	1		
324		All court dockets and filings in all matters against Jeffrey Epstein relating to any victim's claims	1		
325		All prior testimony, statements, reports and affidavits of any witness or experts	1		
326		All charts/analyses prepared based on documents exchanged or later discovered	1		
327		All foundation exhibits	1		
328		All rebuttal and impeachment exhibits	1		
329		Demonstrative aids and exhibits including, but not limited to, charts, timelines, diagrams, models, surveys, photographs and blow-ups	1		
330		All newly discovered documents/exhibits	1		
331		Any and all exhibits listed by Bradley J. Edwards (by identifying these as exhibits, Plaintiff is not waiving his right to object to any of Edwards' exhibits introduced at trial)	1		

Plaintiff/Counter-Defendant reserves his right to supplement this Exhibit List.

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 12th day of December, 2017.

A handwritten signature in black ink, appearing to read "Jack Scarola", is written over a horizontal line.

Jack Scarola

Florida Bar No.: 169440

David P. Vitale Jr.

Florida Bar No.: 115179

Attorney E-Mail(s): jsx@searcylaw.com and
mmccann@searcylaw.com

Primary E-Mail: _scarolateam@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

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Attorneys for Scott Rothstein

EXHIBIT C

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

_____ /

SEVENTH AMENDED AND SUPPLEMENTAL WITNESS LIST
OF COUNTER-PLAINTIFF BRADLEY J. EDWARDS

Counter-Plaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys,
hereby supplements his list of witnesses for trial as follows:

WITNESSES EXPECTED TO BE PRESENTED

1. Bradley J. Edwards
- 2.. Jeffrey Epstein
3. Sarah Vickers (formerly Kellen)
c/o John Stephenson
1201 W. Peachtree Street
Atlanta, Georgia 30339
4. Nadia Marcinkova
c/o Erica Dubno
767 Third Avenue, Suite 3600
New York, New York 10017
5. Virginia Roberts Guiffre
c/o Stan Pottinger
49 Twin Lakes Road, Suite 100
South Salem NY 10590

6. Maria Farmer
c/o Peter Guirguis, Esq.
Mintz & Gold LLP
600 Third Avenue, 25th Floor,
New York 10016
7. Annie Farmer
c/o Peter Guirguis, Esq.
Mintz & Gold LLP
600 Third Avenue, 25th Floor,
New York, 10016
8. Nadia Bjorlin
13701 Riverside Drive, Suite 800
Sherman Oaks, CA 91423-2449
9. Alexandra Hall
c/o Robert C. Josefsberg, Esq.
Podhurst Orseck, PA
One S.E. 3rd Avenue, Suite 2700
Miami, FL 33131
10. Robert C. Josefsberg, Esquire
Podhurst Orseck, PA
One S.E. 3rd Avenue, Suite 2700
Miami, FL 33131
11. Detective Joseph Recarey
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
12. Chief Michael Reiter
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
13. John Connolly
c/o Simon & Schuster
1230 6th Avenue
New York, New York 10020

14. Charles Lichtman, Esquire
Berger Singerman
300 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, FL 33301
15. Courtney Wild
c/o Adam Horowitz.
Horowitz Law
425 North Andrews Avenue, Suite 2
Fort Lauderdale FL 33301
16. Antonio Figueroa (Tony)
Palm Coast, Florida
17. Records Custodian of Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
18. Records Custodian of United States Attorney's Office
for the Southern District of Florida
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Plaintiff reserves the right to amend this list.


EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 20 of 22

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve
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EXHIBIT D

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

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67. Any and all witnesses whose names appear in depositions, interrogatories or documents produced in response to requests for production provided by Bradley J. Edwards depending on the testimony in Edwards' case in chief.

EXPERT WITNESS

68. D. Culver (Skip) Smith III
Culver Smith III, P.A.
500 South Australian Avenue, Suite 600
West Palm Beach, FL 33401
Telephone: 598-6800

Subject Matter: Mr. Smith will testify as to legal ethics and responsibility, probable cause and professional reputation.

Substance of the Facts and Opinions: The pleadings and information that was available before the original civil proceeding was initiated and discovered during the pendency of the original civil proceeding and deposition testimony.

Summary of Grounds for Each Opinion: Mr. Smith has not reached his final opinions.

Curricula Vitae: A copy of Mr. Smith's Curricula Vitae is attached as **Exhibit A**.

Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice and to call and/or produce any and all additional witnesses necessary for impeachment or rebuttal. Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the parties and the Court.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, Florida 33401
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By: /s/ Scott J. Link

Scott J. Link (FBN 602991)
Kara Berard Rockenbach (FBN 44903)
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Primary: Kara@linkrocklaw.com
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Secondary: Troy@linkrocklaw.com
Secondary: Tanya@linkrocklaw.com
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*Trial Counsel for Plaintiff/Counter-Defendant
Jeffrey Epstein*

SERVICE LIST

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Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i>	Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i>
Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	

D. Culver Smith III
CURRICULUM VITAE

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OCCUPATION/PROFESSION

Lawyer and consultant

Practice emphasis: Counseling and representation of lawyers, law firms, and others on ethics, professional responsibility, professional disciplinary proceedings, sanctions, disqualification, unlicensed practice of law, malpractice, and loss prevention; service as expert witness in litigation involving such matters; conduct of ethics audits for law firms; counseling and representation of applicants for admission or reinstatement to the bar; counseling and representation of public officials and employees on ethics compliance and complaints; conduct of internal corporate investigations; service as special magistrate, arbitrator, and mediator; representation and consultation on appeals in all courts. More than forty-five years of experience in the field, as well as experience in law-firm management.

EXPERIENCE

Counsel for respondents in hundreds of lawyer-disciplinary, unlicensed-practice-of-law, and bar-admission proceedings, including appeals in the Supreme Court of Florida

Representation in dozens of disqualification and sanctions proceedings

Testifying/consulting expert in numerous cases involving lawyer ethics and professional-responsibility issues

Wide variety of civil litigation and appeals, including matters involving contracts, business torts, professional responsibility and malpractice, corporate and partnership relationships, officer and director liability, and trust and estate disputes.

EDUCATION AND LICENSING

Bachelor of Arts, Washington and Lee University, 1964

Doctor of Jurisprudence, Washington and Lee University College of Law, 1969 (replaced LL.B. conferred 1967)

Admitted to practice in:

Florida, 1967

California, 1972 (now inactive)

U.S. District Court, Southern District of Florida

U.S. Court of Appeals, Eleventh Circuit

PROFESSIONAL EMPLOYMENT HISTORY

- Law Clerk to Judge George T. Shannon, Jr., and Judge Robert T. Mann, District Court of Appeal of Florida, Second District, 1967–1968 (summarized briefs and records-on-appeal, researched law, drafted opinions)
- Associate, Jones, Adams, Paine & Foster, P.A., West Palm Beach, 1968 (associate in midsize law firm for four months before commencing active military duty; researched law, drafted pleadings and briefs, conducted depositions, and handled motion hearings)
- Lieutenant, Judge Advocate General's Corps, U.S. Naval Reserve, 1968–1972 (active duty as military lawyer: two years at Naval Law Center, San Diego, CA, prosecuting and defending courts-martial cases; two years as staff judge advocate at Naval Air Station Miramar ("Fightertown U.S.A."), San Diego, CA, advising commanding officer on wide variety of military and civilian legal matters)
- Associate, John W. Dell, P.A., West Palm Beach, 1972–1974 (associate in small, general-practice law firm; handled various litigation and nonlitigation matters)
- Shareholder, Dell and Smith, P.A., West Palm Beach, 1974–1977 (shareholder in small, general-practice law firm; handled various litigation matters, including personal-injury and commercial cases)
- Shareholder, Adams, Coogler, Watson & Smith, P.A., West Palm Beach, 1977–1981 (shareholder in small-to-midsize insurance-defense firm; handled defense of personal-injury, product-liability, and professional-malpractice cases)
- Partner, Steel Hector & Davis, LLP, West Palm Beach, 1981–1991 (senior litigator in large, Miami-based law firm's West Palm Beach office; chaired office litigation department; recruited, trained, and supervised litigation associates and legal assistants; handled wide variety of complex civil business litigation, professional-malpractice cases, and probate litigation)
- Shareholder, Jones, Foster, Johnston & Stubbs, P.A., West Palm Beach, 1992–1997 (shareholder in midsize general-practice law firm; handled wide variety of civil business litigation and probate litigation)
- Partner, Holland & Knight LLP, West Palm Beach, 1997–2002 (senior litigator in international law firm's West Palm Beach office; handled wide variety of civil business litigation, probate litigation, and appeals; served as office Executive Partner, 1998–2002)
- Shareholder, D. Culver Smith III, P.A., West Palm Beach, 2002–2007 (solo trial and appellate practice; substantial focus on lawyer ethics and professional responsibility)
- Partner, Fox Rothschild LLP, West Palm Beach, 2007–2010 (senior litigator in national law firm's West Palm Beach office)
- Shareholder, Culver Smith III, P.A., West Palm Beach, 2010–date (solo legal and consulting practice; substantial focus on ethics, professional responsibility, and related matters; appellate representation and consultation)

PROFESSIONAL AND LAW-RELATED SERVICE

The Florida Bar:

Member, Board of Governors, 1984–1988 (Executive Committee, 1987–1988)

Member, Professional Ethics Committee, 2001–2007, 2010–2016 (Chairperson, 2004–2005, 2006–2007)

Member, Vision 2016 Commission, 2013–2016 (Chairperson, MJP/Reciprocity-State Focus Committee, Bar Admissions Subgroup, 2013–2016)

Member, Standing Committee on Professionalism, 1989–1993, 2016–date (Vice Chairperson, 1989–1992)

Member, Hawkins Commission on Discipline System, 2011–2012

Member, Special Committee to Review 2002 ABA Model Rules, 2002–2006

Member, Ethics 2000 Review Panel, 2001

Member, Law-Related Education Committee, 2007–2008

Member, Long Range Planning Committee, 1987–1989, 1992–2001 (Chairperson, 1988–1989, 1993–1994) (author/editor of *Meeting the Challenges: A Strategic Plan for the Florida Bar*, 1993)

Member, Special Committee to Study Composition of Board of Governors, 1996–1997

Vice Chairperson, Commission on Lawyer Professionalism, 1987–1989 (principal author of *Florida Bar Ideals and Goals of Professionalism* and *Florida Lawyer's Creed of Professionalism* (adopted 1990, superseded 2015))

Chairperson, Special Committee on Priorities for the 1990s, 1986–1987

Member, Special Committee to Study Reapportionment of the Board of Governors, 1986–1987 (author of The Florida Bar's answer and counterpetition in *Florida Bar re Amendments to Rules Regulating the Florida Bar (Reapportionment)*, 518 So. 2d 251 (Fla. 1987) (adopting Florida Bar's proposed plan for apportionment of Board of Governors))

Member, Program Evaluation Committee, 1984–1988 (Chairperson, 1986–1988)

Chairperson, Special Study Committee on Lawyer Referral Services, 1985–1986

Member, Special Study Committee on Model Rules of Professional Conduct, 1983–1984

Member, Fifteenth Judicial Circuit Grievance Committee, 1977–1980 (Chairperson, 1979–1980)

Member, Civil Procedure Rules Committee, 1974–1979

Member, Trial Lawyers Section and Appellate Practice Section

Palm Beach County Bar Association:

President, 1982–1983
President-Elect, 1981–1982
Secretary, 1979–1981
Member, Board of Directors, 1977–1984
President, Young Lawyers Section, 1976–1977
Member, Professionalism Committee, 1990–1991, 2004–date (Co-Chairperson, 2011–2012)
Member, Solo & Small Firm Practitioners Committee, 2011–2012
Member, Judicial Campaign Practices Commission, 2002, 2004, 2006, 2008, 2012, 2014, 2016
Member, Historical Committee, 2003–2009 (Chairperson, 2003–2005, 2006–2009)
Member, Historic Courtroom Fundraising Committee, 2007–2008
Member, Long Range Planning Committee, 1994–1996, 2001–2002
Member, Revitalization of the Bar Committee, 1999–2000
Chairperson, *Bulletin* Editorial Committee, 1995–1997
Chairperson, Circuit Court Civil Practice Committee, 1979
Chairperson, New Member Orientation Committee, 1976–1977
Chairperson, Membership Committee, 1974–1976

American College of Trial Lawyers:

Fellow, 1996–date
Member, Florida State Committee, 2004–2009
Member, Legal Ethics and Professionalism Committee (f/k/a Legal Ethics Committee), 1997–2002, 2005–2013
Chairperson, 2008 Tri-State Meeting Committee, 2006–2008

Association of Professional Responsibility Lawyers:

Member, 2005–date
Member, Program Committee, 2006, 2008–2010, 2014–date (Chairperson, 2008–2010)

Florida Association of Bar Defense Lawyers:

Charter member, 2009–date (member, Board of Directors, 2009–date)

American Bar Association:

Member, Center for Professional Responsibility

Member, Section of Litigation

The Florida Bar Foundation:

Member, Board of Directors, 1988–1992 (Executive Committee, 1990–1991)

Member, Development Committee, 1995–1996, 2000–2005

Member, Improvements in the Administration of Justice IOTA Grant Committee, 1992–1994, 1995–1997

Chairperson, Investment Committee, 1991–1992

Vice Chairperson, Law Student Assistance IOTA Grant Committee, 1990–1992

Member, Legal Assistance for the Poor IOTA Grant Committee, 1988–1991

Chairperson, 2004 Palm Beach County Fellows Campaign

Member, Steering Committee, 2010 Palm Beach County Fellows Campaign

Fourth District Court of Appeal 50th Anniversary Committee, Inc.

Member, Board of Directors, 2011–2016

Fourth District Court of Appeal Historical Society, Inc.

Member, Board of Directors, 2016–date

Member, Florida Fifteenth Circuit Judicial Nominating Committee, 1992–1996 (Chairperson, 1994–1995)

Chairperson, Ad Hoc Magistrate Selection Panel, United States District Court, Southern District of Florida, 1987

Member, Florida Fifteenth Judicial Circuit Media Committee, 2005–2009

Member, Florida Fifteenth Judicial Circuit Indigent Services Committee, 2007–2008

PROFESSIONAL AWARDS AND RECOGNITION

President's Award of Merit, The Florida Bar, 1987

President's Award of Merit, The Florida Bar, 1994

Professionalism Award, Palm Beach County Bar Association, 2002

Outstanding Past Local Bar President, Florida Council of Bar Presidents, 2005

LAW-RELATED ARTICLES AND PUBLICATIONS

"The Pink Elephant in the Office," *Palm Beach County Bar Association Bulletin*, December 2017, pp. 19, 22

"Earned Fees to Be Shared Between Counsel—Operating Account or Trust Account?" *Palm Beach County Bar Association Bulletin*, February 2017, p. 5

"The New 'Florida Bar Professionalism Expectations'—What Now?" *Palm Beach County Bar Association Bulletin*, January 2016, p. 5

"The Monster in the Closet: Trust-Account Responsibility," *Palm Beach County Bar Association Bulletin*, February 2015, p. 9

"Unprofessional' Versus 'Unethical' (Caution: Slippery Road Ahead)," *Palm Beach County Bar Association Bulletin*, February 2014, p. 8

"The Supreme Court's New 'Code for Resolving Professionalism Complaints,'" *Palm Beach County Bar Association Bulletin*, July/August 2013, p. 6

"Motions to Withdraw: Euphemystism on Parade," *Palm Beach County Bar Association Bulletin*, October 2012, p. 11

"Tribute to a Mentor," *Palm Beach County Bar Association Bulletin*, April 2012, p. 10

"Can You Hear Me Now? And Who Else Is Listening?" *Palm Beach County Bar Association Bulletin*, October 2011, p. 19

Code of Pretrial and Trial Conduct Teaching Syllabus, American College of Trial Lawyers, Irvine, 2011 (co-author/contributor)

"The Dance of the Lawyer Expert: What Ethical Issues and When?" *Palm Beach County Bar Association Bulletin*, September 2010, p. 13

"Through the Looking Glass: When Is an 'Earned Retainer' Earned?" *Palm Beach County Bar Association Bulletin*, December 2009, p. 7

"Terminal One-Upmanship and Other Phenomena of the Lawyering Life," *Palm Beach County Bar Association Bulletin*, November 2009, p. 7

"Threatening Disciplinary Proceedings: In the Mind of the Beholder?" *Palm Beach County Bar Association Bulletin*, November 2007, p. 13

"Outsourcing Legal Work: Smart Practice Management or Ethical Quagmire?" *Palm Beach County Bar Association Bulletin*, April 2007, p. 13

- "Lawyers' Ancillary Businesses," *Palm Beach County Bar Association Bulletin*, March 2007, p. 13
- "The Adversary System: A Matter of Theology?" *Palm Beach County Bar Association Bulletin*, December 2006, p. 13
- "Investigators Gone Wild: Who Pays the Tab in a Blame-the-Lawyers World?" *Palm Beach County Bar Association Bulletin*, October 2006, pp. 17–18
- "Changes to the Rules of Professional Conduct," *Palm Beach County Bar Association Bulletin*, July-August 2006, pp. 17–18
- "Metadata: What Are the Ethical Implications?" *Palm Beach County Bar Association Bulletin*, June 2006, p. 7
- Chapter 1, "Theories of Liability," *Professional Liability of Lawyers in Florida*, 4th ed., the Florida Bar, Tallahassee, 2006, (also authored same chapter in earlier editions)
- "Business Transactions With a Client: Are You a Lawyer or an Entrepreneur?" *Palm Beach County Bar Association Bulletin*, May 2005, p. 17
- "Identifying the Client: The First Line of Defense," *Palm Beach County Bar Association Bulletin*, January 2005, pp. 15–16
- "Confidentiality and the 'Snitch Rule': An Ethical Catch-22?" *Palm Beach County Bar Association Bulletin*, December 2004
- Report of the Legal Ethics Committee of the American College of Trial Lawyers on Duties of Confidentiality*, American College of Trial Lawyers, Irvine, CA, 2001 (co-author/contributor)
- "The Bar Looks at the Future," *The Florida Bar Journal*, vol. 71, no. 5, May 1997, p. 32

LAW-RELATED SPEECHES AND PRESENTATIONS

- "Professionalism Expectations and Contentious Cases," at Palm Beach County Bar Association *LLC Member Disputes* seminar, West Palm Beach, June 16, 2017
- "Professionalism," at Palm Beach County Bar Association *Modification of Parenting Plans: Seven Practical Tips* seminar, West Palm Beach, April 28, 2017
- "Great Expectations: Professionalism Expectations for Florida Lawyers," at The Florida Bar *Putting the "Pro" in Professionalism* symposium, West Palm Beach, April 21, 2017 (panelist)
- "Expert Witnesses, Part 2: Permissible Lawyer-Expert Testimony—What Can You Get Into Evidence?" at Association of Professional Responsibility Lawyers meeting, Chicago, August 1, 2015 (moderator)
- "Expert Witnesses, Part 1," at Association of Professional Responsibility Lawyers meeting, Houston, February 7, 2015 (moderator)
- "Ethical Considerations: Your License Is in Play," at Palm Beach County Bar Association *Spying Spouses: Divorce in a World of Cyber Warfare and E-Everything* seminar, West Palm Beach, November 8, 2013

- "The Tangled Web of Ethics, Advertising, Websites & Social Media," at The Florida Bar Family Law Section webinar, September 11, 2013 (panelist)
- "Lawyer Beware: Ethical Issues With Lawyer-Referral and Legal Support Services," at The Florida Bar Masters Seminar on Ethics, Orlando, June 22, 2012 (including written materials)
- "Panel Discussion on Professionalism," at The Florida Bar Young Lawyers Division *Practicing With Professionalism* seminar, West Palm Beach, May 2, 2012 (panelist)
- "Ethics Workshop," at American College of Trial Lawyers Tri-State Meeting, Sea Island, February 10, 2012 (panelist)
- "The New Oath of Admission," at Florida Association for Women Lawyers Palm Beach County Chapter luncheon, West Palm Beach, November 9, 2011 (panelist)
- "Lawyer Beware: Ethical Issues With For-Profit Referral and Legal-Support Services," at Palm Beach County Bar Association Solo & Small Firm Practitioners luncheon, West Palm Beach, November 2, 2011
- "Lawyer Ancillary Business: What Hat Are You Wearing Today—Lawyer or Entrepreneur?" at Association of Professional Responsibility Lawyers meeting, San Francisco, August 6, 2010 (panelist)
- "The Bar's Professional Disciplinary System," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, May 20, 2010 (including written materials)
- "Terminating Representation," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, May 20, 2010 (including written materials)
- "Conflicts of Interest," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, May 20, 2010 (including written materials)
- "Commercial Litigation," at Palm Beach County Bar Association Bench-Bar Conference, West Palm Beach, February 19, 2010 (panelist)
- "Ripped From the Case Law: Corporate Internal Investigations, Multiple Representations, and U.S. v. Ruehle," at American Bankruptcy Institute *Caribbean Insolvency Symposium*, Boca Raton, February 12, 2010 (panelist and counsel for Appellee in mock oral argument)
- "Ethics and Professionalism: The Rothstein Scandal & Beyond," at University of Miami School of Law, Center for Ethics & Public Service, Ethics & Professional Responsibility Program Leadership Luncheon Series, Coral Gables, January 26, 2010 (panelist)
- "Evidentiary Foundations and Objections," at Palm Beach County Bar Association Judicial Luncheon Series luncheon, West Palm Beach, November 16, 2009 (moderator)
- "Panel Discussion on Professionalism," at The Florida Bar Young Lawyers Division *Practicing With Professionalism* seminar, West Palm Beach, October 2, 2009 (panelist)
- "Tanned, Rested, and Ready—Now What? The Practical Side of Expert-Witnessing," at Association of Professional Responsibility Lawyers meeting, Chicago, July 31, 2009 (moderator/panelist)
- Firm Counsel Project Roundtable, at American Bar Association National Legal Malpractice Conference, Miami, April 23, 2009 (moderator)

- "Opening Remarks," at The Florida Bar Young Lawyers Division *Practicing With Professionalism* seminar, Deerfield Beach, February 18, 2009
- "Panel Discussion on Professionalism," at The Florida Bar Young Lawyers Division *Practicing With Professionalism* seminar, West Palm Beach, October 2, 2008 (panelist)
- "Ethics and Professionalism: How to Build Your Reputation & Keep Your License," at University of Miami School of Law, Center for Ethics & Public Service, Ethics & Professional Responsibility Program seminar, Coral Gables, September 9, 2008 (panelist)
- "Trial and Pretrial Conduct on Paper and in Practice: A Cut Above the Ordinary," at Tenth Circuit Bench & Bar Conference, Colorado Springs, September 5, 2008 (panelist)
- "The Bar's Professional Disciplinary System," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, June 6, 2008 (including written materials)
- "Terminating Representation," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, June 6, 2008 (including written materials)
- "Conflicts of Interest," at Lorman Educational Services *Legal Ethics in Florida* seminar, West Palm Beach, June 6, 2008 (including written materials)
- Fifteenth Judicial Circuit Judicial Campaign Conduct Forum, West Palm Beach, May 8, 2008 (panelist)
- "Leadership Through Service," at Palm Beach County Bar Association *Leadership Academy—The Art of Leadership* program, West Palm Beach, April 25, 2008 (panelist)
- "Oh, What Tangled Webs We Weave: Conflicts of Interest in Trust & Estate Practice," at The Florida Bar Real Property, Probate & Trust Law Section *Trust & Estate Symposium: Litigating Under Florida's New Trust Code*, Fort Lauderdale and Tampa, February 7 and 8, 2008 (including written materials)
- "Conflicts of Interest," at Palm Beach County Bar Association *Professionalism Luncheon Series* luncheon, West Palm Beach, February 6, 2008 (including written materials)
- "Investigators (and Lawyers) Gone Wild: The Ethical Ramifications of Pretexting and Undercover Investigations," at American College of Trial Lawyers Tri-State Meeting, Sea Island, February 1, 2008 (including written materials)
- "Investigators (and Lawyers) Gone Wild: The Ramifications of Covert and Deceptive Tactics," at National Association of Legal Investigators conference, Fort Lauderdale, January 25, 2008
- "Dealing With Difficult Opposing Counsel," at Palm Beach County Bar Association *Mentoring Luncheon Series* luncheon, West Palm Beach, December 3, 2007 (panelist)
- "Panel Discussion on Professionalism," at The Florida Bar Young Lawyers Division *Practicing With Professionalism* seminar, West Palm Beach, FL, November 2, 2007 (panelist)
- "Ethics Shrugged: Supervising Outside Agents in a Blame-the-Lawyers World," at The Florida Bar Masters Seminar on Ethics, Orlando, June 29, 2007 (including written materials)
- "Dealing With Difficult Clients," at Palm Beach County Bar Association *Mentoring Luncheon Series* luncheon, West Palm Beach, FL, May 16, 2007 (panelist)

- "You Can't Always Say What You Want: Limits on Lawyer Speech Post-Fieger," at Association of Professional Responsibility Lawyers meeting, Miami Beach, February 9, 2007 (moderator/panelist)
- "Achieving Success in the Practice of Law: Lessons Learned in Thirty-Nine Years at the Bar," at Palm Beach County Bar Association Young Lawyers Section *Lunch With the Legends Series* luncheon, West Palm Beach, November 8, 2006
- "Ethical Concerns Regarding Attorneys' Ancillary Businesses," at The Florida Bar Masters Seminar on Ethics, Boca Raton, June 23, 2006 (including written materials) ("Masters Seminar on Ethics")
- "Conflicts of Interest," at American College of Trial Lawyers *Current Developments in Civil Procedure, Evidence and Legal Ethics* seminar, Hollywood, April 6, 2006 (including written materials)
- "Conflicts of Interest," at CLE International Ethics seminar, Tampa, February 3, 2006 (including written materials)
- "Update on the New Rules of Professional Conduct," at Palm Beach County Bar Association *14th Annual Professionalism Seminar*, West Palm Beach, April 8, 2005
- "Final Arguments," at National Institute for Trial Advocacy (NITA), American College of Trial Lawyers, and Florida Legal Services, Inc., *Critical Trial Skills for Legal Services Attorneys* seminar, Deerfield Beach, January 3-6, 2005 (faculty member)
- "Ethics & the Unauthorized Practice of Law: How Paralegals Are Affected," at Paralegal Association of Florida 26th Annual Meeting & Seminar, West Palm Beach, September 20, 2002
- "Avoiding Legal Malpractice," at Professional Education Systems Institute *The Briar Patch: Thorny Issues in Florida Civil Litigation* seminar, Dania, August 20, 2002 (including written materials)
- "Avoiding Malpractice," at Palm Beach County Bar Association Family Law seminar, West Palm Beach, December 8, 2000
- "Ethical Challenges Facing Today's Attorney," at Palm Beach County Bar Association *9th Annual Ethics and Professionalism Workshop and Seminar*, West Palm Beach, May 31, 2000
- "Applied Ethics," at the Palm Beach County Bar Association North County Section Ethics Seminar and Luncheon, North Palm Beach, May 26, 1999
- "Avoiding Malpractice Claims," at Holland & Knight LLP *Solo and Small-Firm Practitioners Seminar*, West Palm Beach, January 15, 1999
- "Avoiding Malpractice Claims," at Holland & Knight LLP *Solo and Small-Firm Practitioners Seminar*, West Palm Beach, November 5, 1997
- Palm Beach County Bar Association *A Study in Professionalism* seminar, West Palm Beach, April 29, 1996 (panelist)
- "Ethics and Malpractice," at Palm Beach County Bar Association *4th Annual Ethics Luncheon*, West Palm Beach, June 2, 1995
- "Making the Standards of Professionalism Work," at Palm Beach County Bar Association *3rd Annual Ethics Luncheon*, West Palm Beach, May 18, 1993

"Jury System—New Approaches," at American Inns of Court chapter meeting, West Palm Beach, February 11, 1993 (panelist)

"Professionalism in Litigation Practice Outside the Courtroom," at Palm Beach County Bar Association *2nd Annual Ethics Luncheon*, West Palm Beach, May 28, 1992

"Making the Standards Work," at Palm Beach County Bar Association *1st Annual Ethics Luncheon*, West Palm Beach, March 22, 1991

"Role and Responsibility of Lawyers," at Nova Southeastern University School of Law orientation assembly, Fort Lauderdale, August 16, 1990

"Conversations on Professionalism," at Rumger Professional Issues Forum, Orlando, January 1990 (panelist)

"Role and Responsibility of Lawyers," at ceremony for newly admitted Florida lawyers, West Palm Beach, October 30, 1987

"Role and Responsibility of Lawyers," at ceremony for newly admitted Florida lawyers, West Palm Beach, May 31, 1985

"The Bar and Its Works," at West Palm Beach Rotary Club luncheon, West Palm Beach, May 7, 1985

CIVIC AND CHARITABLE SERVICE

Member, Board of Directors, Hanley Center Foundation, Inc. (d/b/a Hanley Foundation), 2013–date (Treasurer, 2015–date)

Member, Board of Directors, Education Foundation of Palm Beach County, Inc., 1986–2009 (President, 1989–1991, 1992–1995; Chairperson, 2002–2003; Honorary Co-Chairperson, 25th Anniversary Spirit of Youth Awards Dinner, February 19, 2009)

Member, State Board of Directors, Children's Home Society of Florida, Inc., 2005–2008 (Member, Governance Committee, 2007–2008)

Member, Division Advisory Board, South Coastal Division, Children's Home Society of Florida, Inc., 2002–2011 (Chairperson, Bylaws Committee, 2007–2010; Co-Chairperson, Fund Development Committee, 2010–2011)

Member, Board of Directors, Nelle Smith Residence for Girls, Inc., 1982–1989, 1997–2009 (President, 1986–1988, 1997–2000, 2002–2009)

Member, Roger Dean Stadium Advisory Board, 2002–date (Chairperson, 2013–2014)

Member, Board of Directors, Greater West Palm Beach Division, Florida/Puerto Rico Affiliate, American Heart Association, 2001–2003

Member, Economic Council of Palm Beach County, Inc., 1988–2002 (Member, Education Committee, 1989–1992, 1994–1998; Member, Executive Committee, 1994–1995; Member, Task Force on the Florida Constitution, 1997–1998; Member, Strategic Action Committee, 2000–2002)

Co-Chairperson, Steering Committee, Principals Leadership Training Institute (joint project of the School Board of Palm Beach County and the Education Foundation of Palm Beach County), 2003–2004

Member, School Board of Palm Beach County Superintendent-Candidates Citizens Interview Committee, 1995

Member, School Board of Palm Beach County Strategic Planning Committee, 1988–1992

Member, Palm Beach County Court Facilities Planning Committee, 1986–1987

Member, Coordinating Committee, Project Mosaic (community-wide collaboration to develop strategies for achieving stable racial balance in Palm Beach County's public schools), 1989–1991

Member, Steering Committee, Education Foundation of Palm Beach County Superintendent-Qualifications Forum, 1995

Member, Palm Beach County Champions, WorldClass Schools, 1995–1999 (Chairperson, 1995–1997)

Member, Campaign Cabinet, United Way of Palm Beach County, Inc., 2001–2002

Member, Board of Directors, Zoological Society of the Palm Beaches, Inc., 1970s

Member, Board of Directors, Legal Aid Society of Palm Beach County, 1981–1990

Member, Board of Directors, YMCA of the Palm Beaches, Inc., 1983–1986

Member, Society for American Baseball Research (SABR), 1997–date (Co-Chairperson, Host Committee, 2000 Annual Convention)

Sustaining member, Friends of the Hall of Fame (National Baseball Hall of Fame and Museum, Inc.), 1999–date

Member, Board of Directors, El Cid/Prospect Park/Southland Park Homeowners Association, 1987–1988

Member, Palm Beach Chapter, Washington and Lee University Alumni Association (Chairperson, 1985–1990)

MISCELLANEOUS ARTICLES AND PUBLICATIONS

"The Inquisitor General," *Palm Beach Post*, February 22, 2010, p. A13 (op-ed.)

"Sticklers Unite! Abolish Capital Punishment! (Part 3)," *Palm Beach County Bar Association Bulletin*, January 2009, p. 19 (regarding capitalization)

"Sticklers Unite! Abolish Capital Punishment! (Part 2)," *Palm Beach County Bar Association Bulletin*, November 2008, p. 16 (regarding capitalization)

"Sticklers Unite! Abolish Capital Punishment! (Part 1)," *Palm Beach County Bar Association Bulletin*, October 2008, p. 19 (regarding capitalization)

"Sticklers Unite! Save Only, the Lonely!" *Palm Beach County Bar Association Bulletin*, May 2008, p. 17

"Sticklers Unite! Ban Verbing the Noun!" *Palm Beach County Bar Association Bulletin*, January 2008.
pp. 11, 21

"Sticklers Unite! Stamp Out Semicolonitis!" *Palm Beach County Bar Association Bulletin*, July-August
2007, p. 17

"Sticklers Unite! Save the Apostrophe!" *Palm Beach County Bar Association Bulletin*, May 2007, p. 18

"Sticklers Unite! Stamp Out Death by Comma!" *Palm Beach County Bar Association Bulletin*, March
2007, pp. 18–19

From McGillicuddy to McGwire: Baseball in Florida and the Caribbean, Society for American Baseball
Research, Cleveland, 2000 (editor)

"From McGillicuddy to McGwire: Spring Home to Record-Setters," *From McGillicuddy to
McGwire: Baseball in Florida and the Caribbean*, Society for American Baseball Research,
Cleveland, 2000, pp. 3–5

"All-Time Florida-Born Major League Baseball Team," *From McGillicuddy to McGwire: Baseball in
Florida and the Caribbean*, Society for American Baseball Research, Cleveland, 2000, pp. 15–16

MISCELLANEOUS SPEECHES AND PRESENTATIONS

"Public Education: The Lifeblood of Democracy," given at Education Foundation of Palm Beach
County Spirit of Youth Awards dinner, West Palm Beach, January 30, 2003

"Citizenship and the Search for Justice," given at Daughters of the American Revolution Constitution
Week luncheon, Palm Beach, September 16, 1996

"The Future of Public Education," given at Sun-Sentinel "The '90s: Palm Beach County Faces the
Future" forum, Lake Worth, May 15, 1990

PERSONAL

Born and reared in West Palm Beach, Florida (fourth-generation resident)

Married to Dr. Donna Marks; two children, two grandchildren, three stepchildren, and three
step-grandchildren

Hobbies and interests:

Baseball—past, present, and future

Piano

Lexicology, syntax, and writing style

EXHIBIT E

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EXHIBIT F

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
NOTICE OF PROPOSED JURY INSTRUCTIONS AND VERDICT FORM

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), pursuant to Florida Rule of Civil Procedure 1.470, files this Notice of Proposed Jury Instructions and Verdict Form. Epstein adopts Defendant/Counter-Plaintiff Bradley J. Edwards' ("Edwards") November 9, 2017, proposed Standard (Civil) Jury Instructions Nos. 201.3, 202.2, 202.3, 202.4, 301.1, 301.2, 301.3, 301.4, 301.5, 406.1, 406.3, 406.6, 406.7, 406.9, 601.1, 601.2, 601.5 and 700, which Epstein has not restated here. Epstein objects to Edwards' November 9, 2017, proposed Jury Instructions Nos. 201.1, 201.2, 406.2, 406.4, 406.5, 406.8, 406.12, 503.2 and Adverse Inference, and Edwards' November 14, 2017, and December 1, 2017, Supplemental Instructions. Epstein has provided alternative and additional instructions for the Court's consideration.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, Florida 33401
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

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Trial Counsel for Plaintiff/Counter-Defendant
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---	--

Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i>	Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i>
Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 1
101.1 Oath of Jurors Before Voir Dire

Do you solemnly swear or affirm that you will answer truthfully all questions asked of you as prospective jurors [so help you God]?

Source:

Florida Standard Jury Instruction (Civil) 101.1

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 2

Qualifications Instruction Before Voir Dire

Many of you have electronic devices such as cell phones, smartphones, tablets, and laptops. Even though you have not yet been selected as a juror, there are some strict rules that you must follow about electronic devices.

When you are called to a courtroom, the judge will give you specific instructions on the use of electronic devices. These rules are so important that the judge may tell you that you must turn off your cell phone or other electronic devices completely or that you cannot have your cell phone or electronic devices in the courtroom. If someone needs to contact you in case of an emergency, the judge will provide you with a phone number where you can receive messages.

If the trial judge allows you to keep your cell phones, computers, or other electronic devices, you cannot use them to take photographs, video recordings, or audio recordings of the proceedings in the courtroom or your fellow jurors. You must not use them to search the Internet or to find out anything related to any cases in the courthouse.

Why is this restriction imposed? This restriction is imposed because jurors must decide the case without distraction and only on the evidence presented in the courtroom. I know that, for some of you, these restrictions affect your normal daily activities and may require a change in the way you are used to communicating and perhaps even in the way you are used to learning.

If you investigate, research, or make inquiries on your own, the trial judge has no way to make sure that the information you obtain is proper for the case. The parties likewise have no opportunity to dispute or challenge the accuracy of what you find. Any independent investigation by a juror unfairly and improperly prevents the parties from having that opportunity our judicial system promises.

Between now and when you have been discharged from jury duty by the judge, you must not discuss any information about your jury service with anyone, including friends, co-workers, and family members. You may tell those who need to know where you are that you have been called for jury duty. If you are picked for a jury, you may tell people that you have been picked for a jury and how long the case may take. However, you must not give anyone any information about the case itself or the people involved in the case. You must also warn people not to try to say anything to you or write to you about your jury service or the case. This includes face-to-face, phone or computer communications.

I want to stress that you must not use electronic devices or computers to talk about this case, including tweeting, texting, blogging, e-mailing, posting information on a website or chat room, or any other means at all. Do not send or accept any messages, including e-mail and text messages, about your jury service. You must not disclose your thoughts about your jury service or ask for advice on how to decide any case.

The judge will tell you when you are released from this instruction. Remember, these rules are designed to guarantee a fair trial. It is important that you understand the rules as well as the

impact on our system of justice if you fail to follow them. If it is determined that any one of you has violated this rule, and conducted any type of independent research or investigation, it may result in a mistrial. A mistrial would require the case to be tried again at great expense to the parties and the judicial system. The judge may also impose a penalty upon any juror who violates this instruction. All of us are depending on you to follow these rules, so that there will be a fair and lawful resolution of every case.

Source:

Florida Standard Jury Instruction (Civil) (not numbered)

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 3

201.1 Description of the Case Before Voir Dire

Welcome. [I] [The clerk] will now administer your oath.

Now that you have been sworn, I'd like to give you an idea about what we are here to do.

This is a civil trial. A civil trial is different from a criminal case, where a defendant is charged by the state prosecutor with committing a crime. The subject of a civil trial is a disagreement between people or companies, where the claims of one or more of these parties have been brought to court to be resolved. It is called "a trial of a lawsuit."

This case has two components. First, Plaintiff Jeffrey Epstein has a claim against Defendant Scott Rothstein for utilizing three cases that Rothstein's firm had against Epstein to fabricate other claims and continue the operation of a Ponzi scheme. Second, about whether Plaintiff Jeffrey Epstein had probable cause to initiate and continue a civil proceeding against Defendant Bradley Edwards alleging that Edwards knew or should have known about Rothstein's Ponzi scheme.

Bradley Edwards is an attorney. In August and September 2008, while he was a sole practitioner, Edwards filed three claims against Epstein for alleged sexual misconduct.

In late March 2009, Edwards joined the law firm of Rothstein Rosenfeldt and Adler ("RRA"). At the time he joined RRA, Edwards held the title of "partner" and he turned over to Scott Rothstein the three clients who had brought claims against Epstein. RRA continued to pursue these clients' claims until the firm imploded in November 2009.

It was publicly disclosed in early November 2009 that Rothstein, the senior partner of RRA, had conducted a fraudulent Ponzi scheme which, in part, had used the fact that sexual abuse claims against Epstein were being prosecuted by RRA to induce investors to buy interests in fictitious, non-existent settlements of sexual abuse claims against Epstein. Rothstein's scheme raised hundreds of millions of dollars and was one of the largest frauds in U.S. history.

In early December 2009, Epstein, through his attorneys, filed a lawsuit against Edwards, Rothstein and one of Edwards' clients. Epstein alleged that while Edwards was a partner at RRA in 2009, the cases Edwards brought against Epstein when Edwards was a sole practitioner in 2008, were being used in 2009 to pursue issues and evidence unrelated to and unnecessary to the claims pled in those cases, and instead were done to benefit and lure investors into Rothstein's Ponzi scheme.

Edwards countersued Epstein for malicious prosecution. Edwards contends that Epstein filed the lawsuit for the sole purpose of attempting to intimidate him into abandoning or cheaply compromising his clients' claims. Epstein eventually settled the cases with Edwards' three clients.

A default was entered against Rothstein because he failed to respond to Epstein's Complaint. Epstein voluntarily withdrew his claims against Edwards' client in August 2010.

Epstein dismissed his claims against Edwards in August 2012 without prejudice to his right to reassert them at a later time. The only claim pending is Edwards' claim against Epstein for malicious prosecution.

The principal witnesses who may testify in this case are *Jeffrey Epstein (via video deposition), Bradley Edwards, Scott Rothstein (via video deposition), and Mr. Edwards' clients (L.M., E.W. and Jane Doe).*

Source:

Florida Standard Jury Instruction (Civil) 201.1

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 4

201.2 Introduction of Participants and Their Roles

Who are the people here and what do they do?

Judge/Court: I am the Judge. You may hear people occasionally refer to me as "The Court." That is the formal name for my role. My job is to maintain order and decide how to apply the rules of the law to the trial. I will also explain various rules to you that you will need to know in order to do your job as the jury. It is my job to remain neutral on the issues of this lawsuit.

Parties: A party who files a lawsuit is called the Plaintiff. A party that is sued is called the Defendant.

Attorneys: The attorneys have the job of representing their clients. That means they speak for their client here at the trial. They have taken oaths as attorneys to do their best and to follow the rules for their profession.

Plaintiff/Counter-Defendant's Counsel: The attorney on this side of the courtroom, Scott Link, represents Jeffrey Epstein, who is the person who filed the initial proceeding here at the courthouse. His job is to present his client's side of things to you. He and his client will be referred to most of the time as "the Plaintiff" or "*the Counter-Defendant.*" Mr. Link, will you please introduce who is sitting at the table with you?

Defendant/Counter-Plaintiff's Counsel: The attorney on this side of the courtroom, Jack Scarola, represents Bradley Edwards, one of the defendants who has been sued and who brought a counterclaim against Mr. Epstein. His job is to present his client's side of things to you. He and his client will usually be referred to here as "the Defendant" or "*the Counter-Plaintiff.*" Mr. Scarola, will you please introduce who is sitting at the table with you?

Court Clerk: This person sitting in front of me, (name), is the court clerk. [He] [She] is here to assist me with some of the mechanics of the trial process, including the numbering and collection of the exhibits that are introduced in the course of the trial.

Court Reporter: The person sitting at the stenographic machine, (name), is the court reporter. [His] [Her] job is to keep an accurate legal record of everything we say and do during this trial.

Bailiff: The person over there, (name), is the bailiff. [His] [Her] job is to maintain order and security in the courtroom. The bailiff is also my representative to the jury. Anything you need or any problems that come up for you during the course of the trial should be brought to [him] [her]. However, the bailiff cannot answer any of your questions about the case. Only I can do that.

Jury: Last, but not least, is the jury, which we will begin to select in a few moments from among all of you. The jury's job will be to decide what the facts are and what the facts mean. Jurors should be as neutral as possible at this point and have no fixed opinion about the lawsuit.

In order to have a fair and lawful trial, there are rules that all jurors must follow. A basic rule is that jurors must decide the case only on the evidence presented in the courtroom. You must not communicate with anyone, including friends and family members, about this case, the people and places involved, or your jury service. You must not disclose your thoughts about this case or ask for advice on how to decide this case.

I want to stress that this rule means you must not use electronic devices or computers to communicate about this case, including tweeting, texting, blogging, e-mailing, posting information on a website or chat room, or any other means at all. Do not send or accept any messages to or from anyone about this case or your jury service.

You must not do any research or look up words, names, [maps], or anything else that may have anything to do with this case. This includes reading newspapers, watching television or using a computer, cell phone, the Internet, any electronic device, or any other means at all, to get information related to this case or the people and places involved in this case. This applies whether you are in the courthouse, at home, or anywhere else.

Many of you may have cell phones, tablets, laptops or other electronic devices with you here in the courtroom.**

***The trial judge should select one of the following two alternative instructions explaining the rules governing jurors' use of electronic devices, as explained in Note on Use 1.*

Alternative A: [All cell phones, computers, tablets or other types of electronic devices must be turned off while you are in the courtroom. Turned off means that the phone or other electronic device is actually off and not in a silent or vibrating mode. You may use these devices during recesses, but even then you may not use your cell phone or electronic device to find out any information about the case or communicate with anyone about the case or the people involved in the case. Do not take photographs, video recordings or audio recordings of the proceedings or of your fellow jurors. After each recess, please double check to make sure your cell phone or electronic device is turned off. At the end of the case, while you are deliberating, you must not communicate with anyone outside the jury room. You cannot have in the jury room any cell phones, computers, or other electronic devices. If someone needs to contact you in an emergency, the court can receive messages and deliver them to you without delay. A contact phone number will be provided to you.]

Alternative B: [You cannot have any cell phones, tablets, laptops, or other electronic devices in the courtroom. You may use these devices during recesses, but even then you may not use your cell phone or electronic device to find out any information about the case or communicate with anyone about the case or the people involved in the case. Do not take photographs, video recordings or audio recordings of the proceedings or your fellow jurors. At the end of the case, while you are deliberating, you must not communicate with anyone outside the jury room. If someone needs to contact you in an emergency, the court can receive messages and deliver them to you without delay. A contact phone number will be provided to you.]

What are the reasons for these rules? These rules are imposed because jurors must decide the case without distraction and only on the evidence presented in the courtroom. If you investigate, research, or make inquiries on your own outside of the courtroom, the trial judge has no way to make sure that the information you obtain is proper for the case. The parties likewise have no opportunity to dispute or challenge the accuracy of what you find. That is contrary to our judicial system, which assures every party the right to ask questions about and challenge the evidence being considered against it and to present argument with respect to that evidence. Any independent investigation by a juror unfairly and improperly prevents the parties from having that opportunity our judicial system promises.

Any juror who violates these restrictions jeopardizes the fairness of these proceedings, and a mistrial could result that would require the entire trial process to start over. A mistrial is a tremendous expense and inconvenience to the parties, the court, and the taxpayers. If you violate these rules, you may be held in contempt of court, and face sanctions, such as serving time in jail, paying a fine or both.

All of your communications with courtroom personnel, or me, will be part of the record of these proceedings. That means those communications shall either be made in open court with the court reporter present or, if they are in writing, the writing will be filed with the court clerk. I have instructed the courtroom personnel that any communications you have with them outside of my presence must be reported to me, and I will tell the parties and their attorneys about any communication from you that I believe may be of interest to the parties and their attorneys.

However, you may communicate directly with courtroom personnel about matters concerning your comfort and safety, such as juror parking, location of break areas, how and when to assemble for duty, how you should dress, what personal items can be brought into the courthouse or jury room, and similar inquiries.

If you become aware of any violation of these instructions or any other instruction I give in this case, you must tell me by giving a note to the bailiff.

Source:

Florida Standard Jury Instruction (Civil) 201.2

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 5

201.3 Explanation of the Voir Dire Process

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 201.3.

NOT A CERTIFIED COPY

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 6

101.2 Oath of Juror After Voir Dire

Do you solemnly swear or affirm that you will well and truly try this case between the Plaintiff/Counter-Defendant Jeffrey Epstein, and the Defendant/Counter-Plaintiff, Bradley Edwards, and a true verdict render according to the law and evidence [so help you God]?

Source:

Florida Standard Jury Instruction (Civil) 101.2

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 7
202.2 Explanation of the Trial Procedure

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 202.2.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 8
202.3 Note-Taking by Jurors

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 202.3.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 9
202.4 Juror Questions

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 202.4.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 10

**301.1 Deposition Testimony, Interrogatories, Stipulated Testimony,
Stipulations, and Admissions**

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 301.1. By agreeing to the instruction, Epstein does not waive the argument that some of the items should not be permitted to be used in this case. Epstein agrees to the instruction so that, in the event that either the parties agree, or the Court rules, that these types of items will be used, the relevant instruction should proceed the item.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 11

**301.2 Instruction When First Item of Documentary, Photographic,
or Physical Evidence is Admitted**

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 301.2.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 12
301.3 Instruction When Evidence is First Published to Jurors

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 301.3.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 13

301.4 Instruction Regarding Visual or Demonstrative Aids

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 301.4. Epstein does not waive any objections to any particular demonstrative or visual aids by adopting the proposed instruction, but includes the instruction in case the Court decides, or the parties agree, to permit any such items

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 14
301.5 Evidence Admitted for a Limited Purpose

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 301.5.

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PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 15

301.10 Instruction Before Recess

We are about to take [our first] [a] recess. Remember that all of the rules I have given you apply even when you are outside the courtroom, such as at recess.

Remember the basic rule: Do not talk to anyone, including your fellow jurors, friends, family or co-workers about anything having to do with this trial, except to speak to court staff. This means no e-mailing, text messaging, tweeting, blogging, or any other form of communication. You cannot do any research about the case or look up any information about the case. Remember to observe during our recess the other rules I gave you. If you become aware of any violation of any of these rules at all, notify court personnel of the violation.

After each recess, please double check to make sure [that your cell phone or other electronic device is turned off completely] [that you do not bring your cell phone or other electronic device into the courtroom or jury room].

Source:

Florida Standard Jury Instruction (Civil) 301.10

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 16
406.1 Introduction

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 406.1.

NOT A CERTIFIED COPY

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 17

406.2 Summary of Claims

The claims and defenses in this case are as follows:

Plaintiff Jeffrey Epstein claims that Defendant Scott Rothstein conspired with other lawyers and employees at the firm of Rothstein, Rosenfeld and Adler, for personal greed and enrichment, and engaged in a pattern of racketeering that involved, among other things, marketing of non-existent settlements involving claims (both real and fabricated), against Epstein, and engaging in improper litigation tactics in order to promote and sustain that Ponzi scheme. Epstein brought claims for violations of Florida's Civil Remedies for Criminal Practices Act, violations of Florida's Racketeer Influenced and Corrupt Organization (RICO), abuse of process, fraud and conspiracy to commit fraud. Rothstein did not defend those claims and, consequently, a default was entered against him. A default is not an actual determination of the merits of the claim. Instead, it is a legal ruling that because the defendant did not contest the claim, the defendant will be deemed to have committed the offense. Consequently, the sole issue for your determination on Epstein's claim against Rothstein is the amount of damages that should be awarded to Epstein against Rothstein for the harm that Rothstein caused to Epstein.

Epstein must prove the amount of damages he suffered by Rothstein's actions by the greater weight of the evidence.

Plaintiff Jeffrey Epstein, through his attorneys, also filed claims (called the "civil proceeding") against Defendant Bradley J. Edwards. Epstein voluntarily dismissed his claims against Edwards before the claims were decided by the Court. Epstein's dismissal of the claims against Edwards was without prejudice to Epstein's right to later reassert them. Therefore, those claims are not before you for your determination.

Edwards filed a Counterclaim for malicious prosecution against Epstein which alleged that Epstein maliciously and without probable cause, filed and continued the civil proceeding against him, and that this caused Edwards damage. Epstein denies that claim and also asserts that he is entitled to a verdict in his favor.

Edwards must prove by the greater weight of the evidence that Epstein caused to be filed or continued the civil proceeding against Edwards maliciously and without probable cause and that Epstein's lawsuit caused Edwards to suffer damage.

I will now define some of the terms you will use in deciding this case.

Source:

Florida Standard Jury Instruction (Civil) 406.2

Fla. R. Civ. P. 1.500; *DG Sports Agency LLC v. First Round Mgmt., LLC*, 174 So. 3d 541, 544 (Fla. 4th DCA 2015) (effect of default); *Donohue v. Brightman*, 939 So. 2d 1162, 1164-65 (Fla. 4th DCA 2006) (effect of default); Clerk's Default on January 21, 2010 (D.E. 27)

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 18
406.3 Greater Weight of the Evidence

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 406.3.

NOT A CERTIFIED COPY

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 19
Claim Against Rothstein: Damages

You must consider whether or not to award damages in favor of Jeffrey Epstein against Scott Rothstein for the claims that Jeffrey Epstein has raised against Scott Rothstein.

You should award Jeffrey Epstein an amount of money that the greater weight of the evidence shows will fairly and adequately compensate him for his loss, injury or damage, including any damage.

If you find that Jeffrey Epstein has not proven any loss or damage, you may still award Jeffrey Epstein nominal damages such as one dollar.

Source:

Abuse of Process: *Valdes v. GAB Robins N. Am. Inc.*, 924 So. 2d 862 (Fla. 3d DCA 2006); *S & I Investments v. Payless Flea Market, Inc.*, 36 So. 3d 909, 917 (Fla. 4th DCA 2010). Nominal damages are sufficient to recover on an action for abuse of process. *See Stoler v. Levinson*, 394 So. 2d 462 (Fla. 3d DCA 1981); (*North Star Capital Acquisitions, LLC v. Krig*, 611 F. Supp. 2d 1324 (M.D. Fla. 2009), Florida Standard Jury Instruction (Contracts and Business) 504.11

Fraud: *Prieto v. Smook, Inc.*, 97 So. 3d 916, 917 (Fla. 4th DCA 2012). *See also Sena v. Pereira*, 179 So. 3d 433, 436 (Fla. 4th DCA 2015).

Conspiracy: *Eagletech Communications, Inc. v. Bryn Mawr Inv. Group, Inc.*, 79 So. 3d 855, 863 (Fla. 4th DCA 2012) (quoting *Raimi v. Furlong*, 702 So. 2d 1273, 1284 (Fla. 3d DCA 1997).

Florida Civil Remedies for Criminal Acts: Fla. Stat. 772.103, Fla. Stat. § 772.104, Fla. Stat. 772.102

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 20

Issues on Claim

I will now instruct you on what Edwards must prove to prevail on his claim for malicious prosecution against Epstein.

The issues you must decide on Edwards' claim against Epstein are whether Epstein maliciously and without probable cause instituted or continued a civil proceeding against Edwards which later terminated in favor of Edwards and, if so, whether that action was a legal cause of damage to Edwards.

Edwards must prove each of these elements in order to prevail on his claim for malicious prosecution against Epstein.

I will now instruct you further on the individual elements of this claim.

Source:

Second Paragraph: Florida Standard Jury Instruction 406.8. This paragraph reflects the Standard Instruction, but the order of the instructions has been changed to instruct the jury on the elements first, then explain the elements to the jury. It is Epstein's position this will allow the jury to better understand why they are being instructed on probable cause, malice, etc.; *Alamo Rent-A-Car Inc. v. Mancusi*, 632 So. 2d 1352 (Fla. 1994); *Rivernider v. Meyer*, 174 So. 3d 602 (Fla. 4th DCA 2015); *Hickman v. Barclay's Int'l Realty, Inc.*, 16 So. 3d 154, 155 (Fla. 4th DCA 2009).

Third Paragraph: *Tatum Bros Real Estate & Investment Co. v. Watson*, 109 So. 623 (Fla. 1926); *Union Oil of Cal. Amsco Division v. Watson*, 468 So. 2d 349, 353 (Fla. 3rd DCA 1985); *Alamo Rent-A-Car, Inc. v. Mancusi*, 632 So. 2d 1352, 1355 (Fla. 1994).

Given _____
Given as Modified _____
Denied _____
Withdrawn _____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 21

Probable Cause

Probable cause means that at the time of instituting and then continuing a civil proceeding against another, the facts and circumstances known to Jeffrey Epstein were sufficiently strong to support a reasonable belief that the proceeding against Bradley Edwards was supported by existing facts.

It is Bradley Edwards' burden to prove that Jeffrey Epstein lacked probable cause at every stage of the civil proceeding against Bradley Edwards, from the filing of his suit to the termination of it. You may find that Bradley Edwards failed to show a lack of probable cause even if some of the allegations in the civil proceeding brought by Jeffrey Epstein were ultimately shown to be untrue, or if some of the claims would not have been successful.

The information that Jeffrey Epstein relied on does not have to be information gained first-hand by Jeffrey Epstein, but can be trustworthy information that was provided to Jeffrey Epstein. You may find probable cause existed even if there was no certainty of the outcome of the proceeding.

You cannot base your finding as to probable cause on whether or not you believe that Bradley Edwards has proven that Jeffrey Epstein acted with malice. Likewise, you cannot base your findings as to whether there was a lack of probable cause on evidence that Jeffrey Epstein terminated his civil proceeding against Bradley Edwards.

Source:

First Paragraph: Florida Standard Jury Instruction (Civil) 406.4.

Second Paragraph: *Endacott v. Int'l Hosp., Inc.*, 910 So. 2d 915, 924 (Fla. 3d DCA 2005) (must show lack of probable cause for entire case or claim fails); *May v. Fundament*, 444 So. 2d 1171, 1172-73 (Fla. 4th DCA 1984) (same); *Moity v. Bodin*, 489 So. 2d 474 (La. Ct. App. 1986) (where did not show lack of probable cause for at least several of allegations, then no malicious prosecution).

Third Paragraph: *Gill v. Kostroff*, 82 F. Supp. 2d 1354, 1364 (M.D. Fla. 2000) (does not have to be first-hand information); *Endacott v. International Hospitality, Inc.*, 910 So. 2d 915, 922 (Fla. 3d DCA 2005) ("the defendants need not be certain of the outcome of the underlying proceeding to have probable cause for bringing the counterclaim").

Fourth Paragraph: *Tatum Bros Real Estate & Investment v. Watson*, 109 So. 623 (Fla. 1926) (cannot infer probable cause based on finding of malice); *Central Florida Machinery Co., Inc. v. Williams*, 424 So. 2d 201 (Fla. 2d DCA 1983) ("a bare showing of malice will not, in turn, permit

an inference of a lack of probable cause”); *Applestein v. Preston*, 335 So. 2d 604 (Fla. 3d DCA 1976) (“when want of probable cause was not established, the existence thereof could not be inferred from malice, if malice was proved. Although malice may be inferred from want of probable cause, want of probable cause cannot be inferred from malice”); *Endacott v. Int’l Hosp., Inc.*, 910 So. 2d 915, 924 (Fla. 3d DCA 2005) (“However, termination of an underlying civil proceeding in favor of the present plaintiff is not sufficient evidence that the defendants lacked probable cause”).

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 22

Malice

One acts maliciously in instituting or continuing a civil proceeding against another if he or she does so for the primary purpose of injuring the other, or recklessly and without regard for whether the proceeding is justified, or for any primary purpose except to bring an offender to justice or to establish what he or she considers to be a meritorious claim. In determining whether Jeffrey Epstein acted maliciously, you may consider all the circumstances at the time of the conduct complained of, including any lack of probable cause to institute or continue the proceeding.

You are not required, however, to find malice because of a lack of probable cause to institute or continue the proceedings and you should not draw an inference of malice from a lack of probable cause if other evidence of the circumstances at the time of the conduct lead to a different conclusion.

Source:

First Paragraph: Florida Standard Jury Instruction 406.5

Second Paragraph: *Colonial Stores, Inc. v. Scarbrough*, 355 So. 2d 1181, 1185 (Fla. 1977) ("It is recognized that malice may be inferred from the absence of probable cause. *Adams v. Whitfield*, 290 So. 2d 49 (Fla. 1974); *Duval Jewelry Co. v. Smith*, 102 Fla. 717, 136 So. 878 (Fla. 1931). However, malice is not legally synonymous with the absence of probable cause. *White v. Miami Home Milk Producers Association*, 143 Fla. 518, 197 So. 125 (1940). The inference of malice from the absence of probable cause is not one of law but merely a presumption of fact which may be rebutted. This is an inference which the jury is not required to draw, and which it should not draw if other facts disclosed by the evidence lead to a different conclusion. See *Tatum Brothers Real Estate & Investment Co. v. Watson*, 92 Fla. 278, 109 So. 623 (1926).

Given _____
Given as Modified _____
Denied _____
Withdrawn _____

PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 23
406.6 Instituting or Continuing a Proceeding

Epstein hereby adopts and incorporates Edwards’ Standard Jury Instruction 406.6.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 24
406.7 Legal Cause

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 406.7.

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PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 25
Bona Fide Termination

Bradley Edwards must prove that the termination of Jeffrey Epstein’s civil proceeding against him was a bona fide termination in favor of Bradley Edwards.

A termination of a civil proceeding is a bona fide termination of the civil proceeding only if it ended in a manner that demonstrated that the proceeding lacked merit.

You must consider the reasons for the voluntary dismissal by Jeffrey Epstein of his claims against Bradley Edwards, as well as all of the circumstances surrounding the voluntary dismissal of those claims in making this determination.

Source:

Giving an instruction: Florida Standard Jury Instructions (Civil) 406.8, Notes on Use (“If a fact question exists concerning whether the prior proceeding terminated in favor of the claimant, an additional instruction on that issue will be necessary.” See *Shidlowsky v. National Car Rental Systems, Inc.*, 344 So. 2d 903 (Fla. 3d DCA 1977); *Freedman v. Crabro Motors, Inc.*, 199 So. 2d 745 (Fla. 3d DCA 1967).

First Paragraph: *Debrincat v. Fischer*, 217 So. 2d 68, 70 (Fla. 2017) (element of malicious prosecution claim); *CA Hansen Corp. v. Wicker Smith et al.*, 565 So. 2d 812, 813 (Fla. 3d DCA 1990) (plaintiff must show either a favorable decision on the merits or a bona fide termination); *Alamo Rent-A-Car, Inc. v. Mancusi*, 632 So. 2d 1352, 1356 (Fla. 1994).

Second Paragraph: *Sharaka v. E&A, Inc.*, 135 So. 3d 428, 432 (Fla. 2d DCA 2014) (citing *Cohen v. Corwin*, 980 So. 2d 1153, 1155 (Fla. 4th DCA 2008)).

Third Paragraph: *Cohen v. Corwin*, 980 So. 2d 1153, 1156 (Fla. 4th DCA 2008) (“whether a voluntary dismissal qualifies as a ‘bona fide termination’ of the proceedings in the defendant’s favor depends upon the reasons and circumstances underlying the dismissal”); *Doss v. Bank of America, N.A.*, 857 So. 2d 991, 995 (Fla. 5th DCA 2003) (“whether a withdrawal or abandonment of a lawsuit constitutes a bona fide termination in favor of a person against whom the suit was brought depends on the total circumstances surrounding the withdrawal or abandonment”).

Given _____
Given as Modified _____
Denied _____
Withdrawn _____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 26
406.9 Burden of Proof on Claim

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 406.9.

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PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 27
406.12 Malicious Prosecution Damages

If you find for Jeffrey Epstein, you will not consider the matter of damages. But, if you find for Bradley Edwards, you should award Bradley Edwards an amount of money that the greater weight of the evidence shows will fairly and adequately compensate Bradley Edwards for such damage as the greater weight of the evidence shows was caused by the institution or continuation of the proceeding complained of.

Source:

Florida Standard Jury Instructions (Civil) 406.12

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 28
601.1 Weighing the Evidence

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 601.1.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 29

601.2 Believability of Witnesses

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 601.2. Epstein does not waive any argument that Edwards' should not be permitted to present any expert testimony by inclusion of this jury instruction, but includes it in the event the Court overrules Epstein's objections

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PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 30
601.4 Multiple Claims, Numerous Parties, Consolidated Cases

In your deliberations, you will consider and decide several distinct claims, including claims by Jeffrey Epstein against Scott Rothstein and one claim by Bradley Edwards against Jeffrey Epstein. Although these claims have been tried together, each is separate from the others, and each party is entitled to have you separately consider each claim as it affects that party. Therefore, in your deliberations, you should consider the evidence as it relates to each claim separately, as you would had each claim been tried before you separately.

Source:

Florida Standard Jury Instruction (Civil) 601.4

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

PLAINTIFF/COUNTER-DEFENDANT’S PROPOSED JURY INSTRUCTION NO. 31
601.5 Concluding Instruction (Before Final Argument)

Epstein hereby adopts and incorporates Edwards’ Standard Jury Instruction 601.5.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 32
700 Closing Instructions

Epstein hereby adopts and incorporates Edwards' Standard Jury Instruction 700.

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PLAINTIFF/COUNTER-DEFENDANT'S PROPOSED JURY INSTRUCTION NO. 33
[BIFURCATED ISSUE]
503.2 PUNITIVE DAMAGES¹

There is an additional claim in this case that you must decide. If you find for Bradley Edwards and against Jeffrey Epstein, you must decide whether, in addition to compensatory damages, punitive damages are warranted as punishment to Jeffrey Epstein and as a deterrent to others.

Bradley Edwards claims that punitive damages should be awarded against Jeffrey Epstein for his conduct in maliciously prosecuting a civil proceeding against Bradley Edwards. Punitive damages are warranted against Jeffrey Epstein if you find by clear and convincing evidence that Jeffrey Epstein was guilty of intentional misconduct or gross negligence, which was a substantial cause of damage to Bradley Edwards. Under those circumstances you may, in your discretion, award punitive damages against Jeffrey Epstein. If clear and convincing evidence does not show such conduct by Jeffrey Epstein, punitive damages are not warranted against Jeffrey Epstein.

“Intentional misconduct” means that Jeffrey Epstein had actual knowledge of the wrongfulness of the conduct and that there was a high probability that injury or damage to Bradley Edwards and, despite that knowledge, he intentionally pursued that course of conduct, resulting in injury or damage. “Gross negligence” means that Jeffrey Epstein’s conduct was so reckless or wanting in care that it constituted a conscious disregard or indifference to the life, safety, or rights of persons exposed to such conduct.

“Clear and convincing evidence” differs from the “greater weight of the evidence” in that it is more compelling and persuasive. As I have already instructed you, “greater weight of the evidence” means the more persuasive and convincing force and effect of the entire evidence in the case.

If you decide that punitive damages are warranted against Jeffrey Epstein, then we will have a separate proceeding in which to decide the amount of punitive damages, if any, to be assessed as punishment against Jeffrey Epstein and as a deterrent to others. This amount would be in addition to the compensatory damages you have previously awarded. In making this determination, you should consider the following:

(1) the nature, extent and degree of misconduct and the related circumstances, including the following:

(A) whether the wrongful conduct was motivated solely by unreasonable financial gain;

(B) whether the unreasonably dangerous nature of the conduct, together with the high likelihood of injury resulting from the conduct, was actually known by Jeffrey Epstein;

¹ Punitive damages have been bifurcated from the main trial, so that this instruction should not be given unless it becomes appropriate.

(C) whether, at the time of damage, Jeffrey Epstein had a specific intent to harm Bradley Edwards and the conduct of Jeffrey Epstein did in fact harm Bradley Edwards, and

(2) the financial resources of Jeffrey Epstein; and

However, you may not award an amount that would financially destroy Jeffrey Epstein.

You may in your discretion decline to assess punitive damages.

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Source:

Florida Standard Jury Instruction (Civil) 503.2

Given	_____
Given as Modified	_____
Denied	_____
Withdrawn	_____

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

_____ /

VERDICT FORM

We, the Jury, find:

A. Epstein's Claims Against Rothstein

On Jeffrey Epstein's claims against Scott Rothstein, what amount of damages did Jeffrey Epstein prove by the greater weight of the evidence that he suffered?

\$ _____

B. Edwards' Counterclaim Against Epstein

1. Did Bradley Edwards prove that an original civil proceeding was caused to be commenced or continued against him by Jeffrey Epstein?

YES _____

NO _____

If the Answer to Question 1 is "YES" then proceed to Question 2. If the Answer to Question 1 is "NO," then please date and sign the verdict form and proceed no further.

2. Did Bradley Edwards prove that Jeffrey Epstein was the legal cause of the original civil proceeding against Bradley Edwards?

YES _____ NO _____

If the Answer to Question 2 is "YES" then proceed to Question 3. If the Answer to Question 2 is "NO," then please date and sign the verdict form and proceed no further.

3. Did the termination of Jeffrey Epstein's original civil proceeding constitute a bona fide termination of that proceeding in favor of Bradley Edwards?

YES _____ NO _____

If the Answer to Question 3 is "YES" then proceed to Question 4. If the Answer to Question 3 is "NO," then please date and sign the verdict form and proceed no further.

4. Did Bradley Edwards prove by the greater weight of the evidence that there was **no** probable cause for Jeffrey Epstein to initiate or continue his original civil proceeding against Bradley Edwards?

YES _____ NO _____

If the Answer to Question 4 is "YES" then proceed to Question 5. If the Answer to Question 4 is "NO," then please date and sign the verdict form and proceed no further.

5. Did Edwards prove by the greater weight of the evidence that Epstein instituted or continued his original civil proceeding against Edwards maliciously?

YES _____ NO _____

If the Answer to Question 5 is "YES" then proceed to Question 6. If the Answer to Question 5 is "NO," then please date and sign the verdict form and proceed no further.

6. Did Edwards prove by the greater weight of the evidence that Epstein's institution or continuation of his original civil proceeding against Edwards caused damage to Edwards?

YES _____ NO _____

If the Answer to Question 6 is "YES" proceed to Question 7. If the Answer to Question 6 is "NO," then please date and sign the verdict form and proceed no further.

7. What amount of damage, if any, did Edwards prove, by the greater weight of the evidence, that he suffered as a result of Epstein's institution or continuation of his original civil proceeding against Edwards?

\$ _____

8. Did Edwards prove that punitive damages are warranted as punishment to Epstein for instituting or continuing his original civil proceeding against Edwards and as a deterrent to others from filing a civil proceeding without probable cause?

YES _____ NO _____

YOU HAVE REACHED YOUR VERDICT. PLEASE SIGN AND DATE THIS VERDICT FORM

SO SAY WE ALL, this _____ day of _____, 2018.

FOREPERSON