

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.

---

**MOTION PURSUANT TO F.S. §57.105**

Defendant, L.M., moves this Honorable Court for the imposition of sanctions pursuant to the provisions of F.S. §57.105 on the basis that the Plaintiff and his counsel knew or reasonably should have known that the Plaintiff's claims against L.M., when initially presented to the court or subsequent thereto:

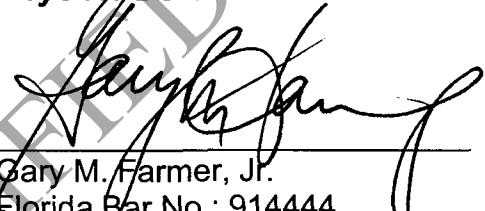
- a) were not supported by the material facts necessary to establish the claims and/or the defenses; or
- b) were not and would not be supported by the application of then existing law to those material facts.

Case No.: 502009CA040800XXXXMBAG  
Motion Pursuant to F.S.§ 57.105

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via U.S. Mail to all counsel on the attached list on March 20, 2010.

Gary M. Farmer, Jr.  
**Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, PL**  
425 N. Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301  
(954) 524-2820  
(954) 524-2822 fax  
**Attorneys for Defendant L.M.**

By:   
Gary M. Farmer, Jr.  
Florida Bar No.: 914444

**COUNSEL LIST**

Robert D. Critton, Jr., Esquire  
Michael J. Pike, Esquire  
Burman, Critton, Luttier & Coleman LLP  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401  
Phone: (561)-842-2820  
Fax: (561)-844-6929  
Attorneys for Jeffrey Epstein

Jack Goldberger  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South  
Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Jack Scarola  
Searcy Denney Scarola Barnhart &  
Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: (561) 686-6300  
Fax: (561) 383-9451  
Attorneys for Defendant, Bradley  
Edwards

Marc Nurik  
Law Offices of Marc S. Nurik  
One East Broward Boulevard, Suite 700  
Fort Lauderdale, FL 33301  
Phone: 954-745-5849  
Fax: 954-745-3556  
Counsel for Scott Rothstein