

IN THE CIRCUIT COURT OF THE 17<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR  
PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,

CASE NO.: 502009CA040800 AG

Plaintiff,

v.

SCOTT ROTHSTEIN, etc., et al.,

Defendants.

MOTION FOR PROTECTIVE ORDER

Russell S. Adler, Esquire, files this Motion for Protective Order and would state:

1. The undersigned was served with a Subpoena for Deposition in the above referenced cause of action, set for January 20, 2011, at 9:00 a.m., which was unilaterally set by Joseph Ackerman.
2. The undersigned is a practicing attorney in Broward County.
3. This deposition was unilaterally set by Mr. Ackerman, without clearing a date with the undersigned.
4. The undersigned's counsel, Fred Haddad, will be out of State until February 2011.
5. The undersigned has called and emailed Mr. Ackerman with regard to resetting the deposition, at a time and date mutually convenient for the undersigned as well as his counsel.
6. Mr. Ackerman has not responded and ignored the undersigned's telephone calls and emails to him.

WHEREFORE, the undersigned prays that this Honorable Court enter an Order granting his Motion for Protective Order and such further relief as this Court deems just and proper.

FILED  
11 JAN 24 PM 2:07

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing has been furnished by  
 U.S. Mail;  Fax;  E-Mail on this  day of January, 2011, to:

Jack Scarola, Esquire  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

Joseph L. Ackerman, Esquire  
901 Phillips Point West  
777 S. Flagler Street  
West Palm Beach, FL 33401

Mark Nurik, Esquire  
One E. Broward Blvd. – Suite 700  
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RUSSELL S. ADLER, P.A.  
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Fort Lauderdale, FL 33301  
Tel: (954) 801-8200  
Facsimile: (954) 208-0500  
Email: [adler@jurytrial.com](mailto:adler@jurytrial.com)

By:

RUSSELL S. ADLER, ESQUIRE  
FLORIDA BAR NO.: 599298