

IN THE CIRCUIT COURT OF THE 17TH
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

CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL 6

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
Fort Lauderdale, FL 33301

RUSSELL S. ADLER, P.A.
401 East Las Olas Boulevard
Suite 1400
Fort Lauderdale, FL 33301
Tel: (954) 801-8200
Facsimile: (954) 208-0500
Email: adler@jurytrial.com

By: _____

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