

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

**MOTION TO WITHDRAW OF FOWLER WHITE BURNETT
AND ITS ATTORNEYS AS COUNSEL OF RECORD
FOR PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN**

Fowler White Burnett, and its attorneys, as counsel of record for the Plaintiff/Counter-Defendant, Jeffrey Epstein, respectfully move, pursuant to the wishes of Mr. Epstein to retain new co-counsel, for the entry of an Order allowing Fowler White Burnett and its attorneys to withdraw as counsel of record and as grounds therefore state as follows:

1. Mr. Epstein is currently co-represented by counsel of record Jack Alan Goldberger, Esq., and Lilly Ann Sanchez, Esq. Fowler White Burnett, through Ms. Sanchez, appeared in this action as co-counsel for Mr. Epstein on or about July 27, 2010, replacing the law firm of Burman, Critton, Luttier and Coleman. Ms. Sanchez left the employ of Fowler, White, Burnett on February 29, 2012, and filed a notice of appearance on behalf of Mr. Epstein on March 16, 2012, for The L-S Law Firm. Mr. Epstein has indicated his intention to retain new co-counsel to replace Fowler White Burnett.

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SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL / PROBATE

2. Irreconcilable differences have arisen between the undersigned counsel and Plaintiff/Counter-Defendant, Jeffrey Epstein, creating the need for the discontinuance of representation of Mr. Epstein in the above-styled matter.

3. A dispute with Mr. Epstein regarding costs and fees under the Representation Agreement executed with Fowler White Burnett also exists, further creating a need to withdraw.

4. None of the parties to this action would be prejudiced by the withdrawal of Fowler White Burnett from this case because the case has not been set for trial.

5. Further pleadings and correspondence in this case should continue to be directed to the Plaintiff/Counter-Defendant Jeffrey Epstein's counsel, Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012 and Lilly Ann Sanchez, Esq., The L•S Law Firm, Four Seasons Tower, 15th Floor, 1441 Brickell Avenue, Miami, FL 33131.

WHEREFORE, Fowler White Burnett and its attorneys respectfully request that this Court enter an Order granting this Motion to Withdraw, releasing Fowler White Burnett and its attorneys from any further obligation in this case.

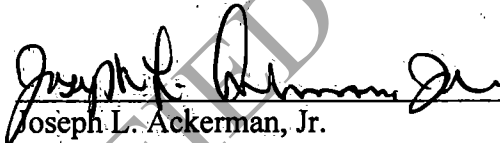
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S. Mail on this 23rd day of April, 2012 to Lilly Ann Sanchez, Esq., The L•S Law Firm, Four Seasons Tower, 15th Floor, 1441 Brickell Avenue, Miami, FL 33131; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East

Epstein v. Rothstein and Edwards
Case No. 502009CA040800XXXXMB/Division AG
Motion to Withdraw as Counsel of Record for Plaintiff

Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; Jack Scarola, Esq., Searcy Denney
Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL
33409; Bradley J. Edwards, Esq., Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.,
425 North Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301; and Mr. Jeffrey Epstein 301
East 66th Street, Suite 10B, New York, NY 10065.

Respectfully submitted,



Joseph L. Ackerman, Jr.
Florida Bar No. 235954
FOWLER WHITE BURNETT, P.A.
901 Phillips Point West
777 South Flagler Drive
West Palm Beach, Florida 33401
Telephone: (561) 802-9044
Facsimile: (561) 802-9976
Attorneys for Jeffrey Epstein, Plaintiff