

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,

EDWARDS OBJECTIONS TO EPSTEIN'S TRIAL EXHIBITS

Counter plaintiff, Bradley J. Edwards, by and through his undersigned counsel, files the following Objections to Jeffrey Epstein's Exhibit List:

INDEX TO OBJECTIONS

- | | |
|------------------------------|-----------------|
| 1. No Objection | 5. Predicate |
| 2. All Objections | 6. Authenticity |
| 3. Materiality and Relevancy | 7. Other |
| 4. Reasonableness | |

<u>Epstein Exhibit Number</u>	<u>Epstein Exhibit Description</u>	<u>Edwards' Objections</u>
1	Information Charging Scott W. Rothstein in <i>United States of America v. Stott W. Rothstein</i> , 09-60331-CR-COHN; dated December 1, 2009.	3, 7 (hearsay)
2	Plea Agreement between <i>United States of America and Scott W. Rothstein</i> , 09-60331-CR-COHN; filed December 1, 2009.	3

3	Amended Complaint in <i>Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.</i> , in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943 (19).	2
4	All Depositions taken of Scott W. Rothstein in <i>In re: Rothstein Rosenfeldt Adler, PA</i> ; 09-34791-RBR and any and all ancillary cases related thereto, including, but not limited to, <i>Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.</i> , Case No. 09-062943(19).	7 (hearsay) 3
5	The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012.	2
6	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in <i>In re: Rothstein Rosenfeldt Adler, P.A.</i> ; 09-34791-RBR.	2
7	Docket from <i>Doe v. United States</i> , 08-80736-CIV-MARRA.	1
8	Any and all exhibits listed and/or used by Bradley J. Edwards	1
9	All Depositions taken of Bradley J. Edwards in the case and chief and the Counterclaim in this matter, via videotape or transcription, including all exhibits used/referenced therein.	2 (except hearsay)

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Edwards Objections to Epstein's Trial Exhibits

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10	All documents and exhibits provided by Bradley J. Edwards in this matter.	2
11	Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by Bradley J. Edwards, including all exhibits marked at said depositions	2
12	All of Edwards's Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions.	2
13	Complaints and Docket from <i>L.M. v. Jeffrey Epstein</i> ; 09-CV-81092-COHN; and 502008 CA 018051 XXXXMB.	1
14	Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein	3
15	Subpoena to Leonard Baird	3
16	Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.	3
17	Any and all exhibits/documents/pleadings referenced in Epstein's Motion for Summary Judgment as to Edwards's Counterclaim.	2
18	Deposition of Jack (John) Scarola dated July 2, 2013 taken in <i>In re: Rothstein Rosenfeldt Adler, PA</i> ; 09-34791-RBR.	3, 7 (hearsay)

19	RRA Firm Directory dated October 23, 2009.	1
20	Screenshots of the Farmer Jaffe Weissing firm website in which Epstein's name appears.	2
21	Screenshots of the Farmer Jaffe Weissing firm, including its attorneys' Facebook pages, and other social media, in which Epstein's name appears.	2
	The Defendants reserve the right to produce any newly discovered evidence upon proper notice	2
	The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal	2
	The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice	2
	All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection at the offices of the undersigned at a mutually convenient time and date	2
Supplemental Exhibit 1	Government's Motion to Withdraw It's Motion For Reduction of Sentence of Scott Rothstein, dated September 26, 2017. <i>United States of America v. Scott W. Rothstein</i> , 09-CR-60331 COHN	3, 7 (hearsay)

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 3rd day of November, 2017.



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