

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. Scott 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)

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)

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Edwards Objections to Epstein's Trial Exhibits
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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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