

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
AND FOR PALM BEACH COUNTY,
FLORIDA.

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendant/Counter-Plaintiffs.

LIMITED DIRECTIONS TO CLERK

Defendant, BRADLEY J. EDWARDS, pursuant to Fla.R.App.P.
9.200(a)(3), hereby directs the Clerk to only include in the Record-on-Appeal the
following documents:

1. DE-1 Complaint dated December 7, 2009;
2. DE-8 Answer and Counterclaim dated December 21, 2009;
3. DE-9 Answer and Counterclaim dated December 21, 2009;
4. DE-19 Order dated January 26, 2010;
5. DE-23 Motion to Dismiss dated February 26, 2010;
6. DE-35 Answer to Counterclaim dated March 26, 2010;

7. DE-36 Reply to Affirmative Defenses dated March 16, 2010;
8. DE-38 Motion for Judgment or Alternative Motion for Summary Judgment dated March 29, 2010;
9. DE-62 Order on Epstein's Motion for Judgment on the Pleadings dated May 11, 2010;
10. DE-102 Order of Dismissal dated August 10, 2010;
11. DE-117 Statement of Undisputed Facts dated September 22, 2010;
12. DE-118 Motion for Final Summary Judgment dated September 22, 2010;
13. DE-127 Motion for Leave to Assert Claim for Punitive Damages dated October 19, 2010;
14. DE-199 Motion for Reconsideration dated January 14, 2011;
15. DE-241 Agreed Order Granting Motion to Amend Complaint dated February 15, 2011;
16. DE-289 Order on Case Management Status date April 12, 2011;
17. DE-292 Amended Complaint dated April 13, 2011;
18. DE-295 Motion to Dismiss dated April 20, 2011;
19. DE-308 Reply in Opposition to Defendant/Counter-Plaintiff's Motion to Dismiss Amended Complaint dated May 13, 2011;
20. DE-346 Order Granting Defendant/Counter-Plaintiff's Motion to Dismiss Amended Complaint dated July 25, 2011;
21. DE-357 Second Amended Complaint dated August 22, 2011;
22. DE-360 Motion to Dismiss Second Amended Complaint dated August 22, 2011;

23. DE-374 Response in Opposition to Defendant/Counter-Plaintiff's Motion to Dismiss Corrected Second Amended Complaint dated September 22, 2011;
24. DE-375 Agreed Order Granting Defendant/Cross-Plaintiff's Ore Tenus Motion to Amend Counterclaim dated October 3, 2011;
25. DE-377 Amended Counterclaim dated October 4, 2011;
26. DE-378 Order on Motion to Dismiss Plaintiff's Second Amended Complaint dated October 4, 2011;
27. DE-380 Motion to Dismiss Amended Counterclaim dated October 21, 2011;
28. DE-383 Answer & Affirmative Defenses to Second Amended Complaint dated October 28, 2011;
29. DE-390 Renewed Motion for Final Summary Judgment dated November 4, 2011;
30. DE-393 Statement of Undisputed Facts dated November 7, 2011;
31. DE-402 Second Amended Counterclaim dated November 29, 2011;
32. DE-415 Motion to Dismiss Second Amended Counterclaim dated December 12, 2011;
33. DE-473 Order on Damages Claimed in Second Amended Counterclaim dated May 8, 2012;
34. DE-479 Third Amended Counterclaim dated May 21, 2012;
35. DE-486 Answer & Affirmative Defenses Counterclaim dated June 14, 2012;
36. DE-488 Reply to Affirmative Defenses dated June 19, 2012;
37. DE-490 Motion to Compel Proper Response to the Counterclaims dated June 19, 2012;

38. DE-493 Motion to Strike Motion to Compel Proper Answer or Deem Unanswered Allegations Admitted dated July 3, 2012;
39. DE-500 Order Granting Motion to Compel Proper Answer or Deem Unanswered Allegations dated July 24, 2012;
40. DE-502 Answer & Affirmative Defenses Counterclaim dated August 2, 2012;
41. DE-506 Motion to Continue Summary Judgment Hearing dated August 14, 2012;
42. DE-507 Order Denying Plaintiff's Motion to Continue Summary Judgment Hearing dated August 16, 2012;
43. DE-508 Notice of Voluntary Dismissal dated August 16, 2012;
44. DE-516 Motion to File Amendment to Third Amended Counterclaim dated August 29, 2012;
45. DE-522 Agreed Order Granting Motion to File Amendment to Third Amended Counterclaim dated September 5, 2012;
46. DE-523 Answer to Amendment to Paragraph 32 of Amended Counterclaim dated September 18, 2012;
47. DE-538 Motion for Order Granting Leave to Assert Claim for Punitive Damages Against the Counter-Defendant dated October 19, 2012;
48. DE-554 Response to Memorandum in Opposition to Second Renewed Motion for Leave to Assert Claim for Punitive Damages dated December 10, 2012;
49. DE-558 Order Granting Renewed Motion for Leave to Assert Claim for Punitive Damages dated December 18, 2012;
50. DE-560 Fourth Amended Counterclaim dated January 9, 2013;

51. DE-569 Motion to Dismiss Fourth Amended Counterclaim dated January 22, 2013;
52. DE-586 Order Dismissing Fourth Counterclaim dated February 11, 2013;
53. DE-589 Reply to Affirmative Defenses dated February 22, 2013;
54. DE-593 Answer & Affirmative Defenses dated February 26, 2013;
55. DE-639 Agreed Order on Plaintiff/Counter-Defendant's Motion to Bifurcate Trial dated August 19, 2013;
56. DE-673 Motion for Summary Judgment dated September 26, 2013;
57. DE-675 Affidavit of Jeffrey Epstein dated September 26, 2013;
58. DE-784 Response to Response in Opposition to Motion for Summary Judgment dated January 17, 2014;
59. DE-785 Notice of Filing Correction to Response in Opposition to Motion for Summary Judgment dated January 21, 2014;
60. DE-786 Reply to Defendant/Counter-Plaintiff's Response in Opposition to Motion for Summary Judgment dated January 22, 2014;
61. DE-792 Notice of Supplemental Authority in Support of Motion for Reconsideration filed February 7, 2014;
62. DE-800 Order Granting Counter-Defendant's Motion for Summary Judgment dated May 21, 2014;
63. DE-801 Order Denying Counter-Plaintiff's Motions for Reconsideration of The Order Granting Motion for Summary Judgment dated May 21, 2014;
64. DE-802 Final Judgment dated May 29, 2014.

STATEMENT OF JUDICIAL ACTS TO BE REVIEWED

The judicial act which Defendant/Counter-Plaintiff anticipates to be reviewed is the granting of Plaintiff/Counter-Defendant's Jeffrey Epstein's Motion for Summary Judgment on the Counterclaim.

I HEREBY CERTIFY that a true copy of the foregoing was furnished to all counsel on the attached service list, by email, on June 30, 2014.

William B. King, Esq.
SEARCY DENNY SCAROLA
BARNHART & SHIPLEY, P.A.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
wbk@searcylaw.com

and

BURLINGTON & ROCKENBACH, P.A.
Courthouse Commons/Suite 350
444 West Railroad Avenue
West Palm Beach, FL 33401
(561) 721-0400
Attorneys for Defendant/Counter-Plaintiff
pmb@FLAppellateLaw.com
kbt@FLAppellateLaw.com

By: /s/ Philip M. Burlington
PHILIP M. BURLINGTON
Florida Bar No. 285862

SERVICE LIST

Epstein v. Rothstein/Edwards

Case No. 502009CA040800XXXXMBAG

W. Chester Brewer, Jr., Esq.

W. CHESTER BREWER, JR., P.A.
250 S. Australian Ave., Ste. 1400
West Palm Beach, FL 33401
(561) 655-4777
wcblaw@aol.com
wbcg@aol.com
Attorneys for Jeffrey Epstein

Fred Haddad, Esq.

FRED HADDAD, P.A.
1 Financial Plaza, Ste. 2612
Fort Lauderdale, FL 33301
(954) 467-6767
haddadfm@aol.com
Attorneys for Jeffrey Epstein

Mark Nurik, Esq.

LAW OFFICES OF MARC S. NURIK
1 E. Broward Blvd., Ste. 700
Ft. Lauderdale, FL 33301
(954) 745-5849
marc@nuriklaw.com
Attorneys for Scott Rothstein

Jack Goldberger, Esq.

ATTERBURY, GOLDBERGER
& WEISS, P.A.
250 So. Australian Ave., Ste. 1400
West Palm Beach, FL
(561) 659-8300
jgoldberger@agwpa.com
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esq.

TONJA HADDAD, P.A.
315 SE 7th Street., Ste. 301
Fort Lauderdale, FL 33301
(954) 467-1223
tonja@tonjahaddad.com
efiling@tonjahaddad.com
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esq.

FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 N. Andrews Ave., Ste. 2
Fort Lauderdale, FL 33301
(954) 524-2820
brad@pathtojustice.com
Attorneys for Defendant Edwards