

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

CIRCUIT CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE HAFELE

vs.

SCOTT ROTHSTEIN,
individually, BRADLEY EDWARDS,
individually,
Defendants/Counter-Plaintiffs.

RESPONSE TO MOTION TO STRIKE
JEFFREY EPSTEIN'S MOTION FOR SUMMARY JUDGMENT

COMES NOW, the Plaintiff/Counter Defendant, JEFFERY EPSTEIN, by and through his undersigned counsel, and files his response to the Motion to Strike Jeffrey Epstein's Motion for Summary Judgment, filed by Defendant/Counter-Plaintiff, Bradley Edwards.

1. On June 30, 2017, Jeffrey Epstein filed his Motion for Summary Judgment. A copy of which is attached hereto as Exhibit A for the convenience of the Court.
2. On September 14, 2017, Bradley Edwards filed a Motion to Strike the Motion for Summary Judgment. A copy of said motion is attached hereto as Exhibit B for the convenience of the Court.
3. Florida Rule of Procedure Rule 1.510(c) reads in pertinent part

Motion and Proceedings thereon

The Motion must state with particularity the grounds on which it is based and the substantial matters of law to be argued and must specifically identify any affidavits, answers to interrogatories, admissions, depositions and other materials as would be admissible in evidence ("Summary Judgment evidence") on which the movant relies.

4. The Motion filed by Epstein contains approximately 8 pages of listed undisputed facts. Each undisputed fact is then substantiated with references to record evidence or other materials that would be admissible in evidence. The referenced materials total at least 500 pages and were filed with the Motion.

5. Rather than dispute the facts set forth in Epstein's Motion for Summary Judgment (which he cannot do); Edwards has chosen to represent to the Court that no undisputed facts were set forth in the Motion for Summary Judgment and that there were no supporting documents. These assertions are clearly incorrect and the motion should be denied.

WHEREFORE, Jeffrey Epstein moves the Court to deny Bradley Edwards' Motion to Strike Jeffrey Epstein's Motion for Summary Judgment.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all Parties on the attached Service List by Electronic Service and by E-Mail, this 21st day of September, 2017.

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