

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,

Defendants,

/

**COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
AMENDED EXHIBIT LIST**

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his Amended Exhibit List as follows:

INDEX TO OBJECTIONS

O. No objection	5. Privileged
1. All objections	6. Opinion
2. All objections, except authenticity	7. Hearsay
3. Irrelevant or immaterial	8. Authenticity lacking
4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence	9. Other (please identify basis of objection)

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Search Warrant of Jeffrey Epstein's home being executed.			
17.	Application for Search Warrant of Jeffrey Epstein's home.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home.			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
32.	List of properties and vehicles in Larry Visoski's name.			
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.			
36.	All Complaints in which Jeffrey Epstein is/was a defendant.			
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.			
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.			
41.	Report and Analysis of Jeffrey Epstein's assets.			
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home..			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victim.			
47.	Expert Dr. L. Dennison Reed's Report of Victim.			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Massage Table.			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts.			
67.	Documents related to Jeffrey Epstein's investments.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

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Counter-Plaintiff	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	List of planes owned by Jeffrey Epstein.			
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06.			
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06.			
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06.			
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06.			
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06.			
75.	Letter from Goldberger dated 6-22-06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

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Case No. 502009CA040800XXXXMBAG
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Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410.			
84.	Guy Fronstin letter dated 4-17-06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			
88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes.maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher dated 5-1-06.			
95.	Alexandra Hall Police Report dated 11-28-04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter dated 7-9-08.			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
122.	All flight logs for any Epstein owned or controlled aircraft			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff

No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
133.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
134.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
135.	Any and all documents produced in this action.			
136.	Any and all depositions taken in this action.			
137.	Any documents or other exhibit attached to or used during any deposition in this action.			
138.	Any and all exhibits, documents, etc. referred to in any deposition.			
139.	Any and all documents and exhibits designated by all parties to this action.			
140.	Any and all exhibits needed for impeachment or rebuttal.			
141.	Any and all pleadings filed in this action.			
142.	Any and all records produced or that will be produced by all records custodians relative to this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
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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 9th day of November, 2017.



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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

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