

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

/

EDWARDS' OBJECTIONS AND COUNTER-DESIGNATIONS
RE: DEPOSITION OF
BRADLEY J. EDWARDS TAKEN NOVEMBER 10, 2017

Bradley J. Edwards, by and through his undersigned counsel, hereby files his Objections and Counter-Designations to the Designations of Jeffrey Epstein regarding the testimony from Bradley J. Edwards' November 10, 2017, deposition transcript for use in the instant case and/or as rebuttal:

A-C ATTORNEY-CLIENT PRIVILEGE ASSERTION

A ARGUMENTATIVE

BE BEST EVIDENCE

SHK SECOND HAND KNOWLEDGE

VS VIOLATES STIPULATION

LP LITIGATION PRIVILEGE

H HEARSAY

O OPINION

COL COLLOQUY

R RELEVANCE

REP REPETITIOUS

C COMPOUND/NO ANSWER

S SPECULATION

I I IMPROPER IMPEACHMENT

P NO PROPER PREDICATE

IC IMPROPER CROSS

Designation	Completeness/Counter / Cross Designation	Objections	Response to Objections
	5:1-6:9		
8:15-9:15			
11:15-25			
12:1-19		12:17-12:19 C	
12:22-13:14			
21:3-22:17		21:8-22:4 C	
23:4-28:18		23:17-23:18 C	
		25:17-26:25 R O I 403	
		27:1-28:5 R, 403	
28:25-30:2		29:1-13 O, R, 403	
30:12-31:2			
32:12-15			
32:21-33:17			
33:23-38:12		35:12-18 O, R 403	
		36:15-19 O, COL	
		37:1-5 O, COL	
		37:19-20 O, COL	
		37:24-39:1 O, A,C	
38:20-39:1			
39:11-40:21			
40:24-41:4			
41:9-42:19			

Designation	Completeness/Counter / Cross Designation	Objections	Response to Objections
42:22-44:13		43:13-44:25 O, 403 I I	
44:19-46:8		45:1-46:8 O, 403, I I	
		46:23-48:25 O, R	
46:24-47:14			
48:15-49:8		49:1-14 O, R, 403	
49:13			
50:3-53:23		50:3-53:23 O, R, 403	
54:13-20		54:12-56:9 O, R, 403 II	
54:22-61:1			
61:16-63:12			
64:6-65:24			
66:3-15			
67:9-68:7		67:17-69:21 O, R, 403	
68:12			
68:15-75:25			
76:13-77:23			
78:3-6			
78:20-79:3			
79:6-15			
80:8-83:14			
83:19-86:2			
87:4-19			
88:7-19			
88:22-89:23			
91:1-19			
91:23-92:5			
92:15-23		92:15-23 O, H	
94:4-6		94:4-6 H	
94:11-19			
94:24-97:9		96:3-97:9 O, H	
97:19-101:7		97:19-98:23 O H R 403	
		99:1-100:25 H, R 403	
		101:1-102:24 O, R, H	
		Rule 403	
101:16-103:2			
103:12-23			
104:2-105:2		104:24-105:2 O, C	
105:7-106:19	106:20-22	105:7-106:7 O, R	
	108:23-110:3		
110:16-22			
111:7-112:6			
112:11-16			
112:18-114:5		112:21-25 O, H	
		113:1-114:2 OHR 403	

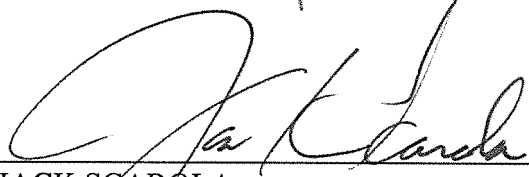
114:12-116:25		115:7-117:21 OHR403	
117:2-21			
120:5-121:13		120:19-25 O,H, R	
		121:1-13 O, H	
122:24-123:5		122:24-124:22 OHR	
123:8-22			

Designation	Completeness/Counter / Cross Designation	Objections	Response to Objections
123:24-124:22			
125:4-24		125:16-25 O,H,SHK	
126:2-10		126:2-128:23 O,H,R	
126:14-128:4			
128:7-23			
134:14-135:18			
135:23-24			
136:2-7			
136:15-138:24		137:25-138:12 O, R	
		A-C PRIV	
139:11-144:13			
145:2-4			
147:3-151:10		147:3-148:25 O, R	
		149:1-156:25 O, R	
151:21-167:2		157:1-166:15 O,R, H	
167:21-176:23		168:11-170:17 O,R	
		171:1-9 O, R, H	
		172:5-174:25 O,R,403	
		175:1-3 O, C	
		175:1-176:23 O,R,403	
177:8-179:20		177:8-179:20 O,R,403	
181:12-183:23			
184:7-23			
184:25-185:25		185:9-25 O,C, II	
189:3-193:13		189:3-190:20 O, R	
		191:12-192:9 O, R	
193:18-195:25		193:18-20 O, C	
		194:5-17 O, R, 403	
196:12-15			
197:13-15		197:13-15 O,C	
198:23-25		198:23-25 O, C	
199:2-200:1		199:12-200:1 O, R	
201:5-203:14		202:16-18 O, C	
203:19-204:1			
204:5-205:13			

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Designation	Completeness/Counter / Cross Designation	Objections	Response to Objections
237:19-238:7		237:19-239:24 O, R	
238:14-239:24			
241:5-242:4			
243:14-244:23		243:22-244:25 O, R	
		A, IC, C	
245:15-246:14			
247:8-18		247:16-18 COL	
248:21-249:25		249:9-10 C	
250:10-24		250:10-24 R	
253:2-258:7		256:9-25 R, 403	
258:18-268:19		258:5-7 R	
		258:25-261:9 R	
		262:16-268:19 R	
276:24-277:24		276:24-277:25 A	
278:14-15		278:14-15 A	
288:10-23		288:10-13 R	
289:15-22		289:15-22 R	
289:25-292:25			
294:6-1			
297:6-300:21		298:18-30:21 R	
303:24-304:22		303:24-304:22 R	
304:23-305:10 (subject to MPO)			
305:11-307:2		305:8-307:2 R	
	307:2-308:16		
	310:13-312:15		
	312:24-313:11		
	313:17-321:8		
321:9-322:2			
	322:3-325:15		
325:22-326:1			
326:16-327:6			
	327:7-23		
327:24-328:14			
	329:9-25		
330:1-332:24			
333:11-339:7			

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 25th day of JANUARY, 2017.



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