

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

---

**MOTION TO STAY PROCEEDINGS PENDING  
COMPLETION OF ADDITIONAL DISCOVERY**

Counter-Plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an order staying further proceedings with respect to JEFFREY EPSTEIN'S Motion for Attorney's Fees and Costs, and in support thereof would show:

1. EPSTEIN seeks to recover fees and costs against BRADLEY EDWARDS pursuant to a Proposal for Settlement that offered a payment of \$300,000 to BRADLEY EDWARDS in exchange for a dismissal and release of EDWARDS' claims for compensatory and punitive damages against EPSTEIN and EDWARDS' acceptance of a prohibition on EDWARDS, his attorneys, and agents "that they shall not in any method or manner discuss, publish, or disseminate any information concerning the settlement..." The confidentiality clause sought to be imposed by EPSTEIN on EDWARDS, his attorneys and agents also broadly sought to prohibit disclosure of "the reasons for the payment."

**EDWARDS ADV. EPSTEIN**

**Case No.: 502009CA040800XXXXMBAG**

**Motion to Stay Proceedings Pending Completion of Additional Discovery**

2. As EPSTEIN has correctly observed, "EDWARDS proffered two arguments to support his assertion that EPSTEIN'S Proposal was invalid: to wit: "[t]he Proposal is invalid because EPSTEIN failed to explain material terms of the confidentiality clause, and its implications; and EPSTEIN cannot prove he has beaten or even equaled his Proposal." EDWARDS' Opposition pp. 5-6 as quoted in EPSTEIN'S Memorandum of Law Regarding Ethical Issues...at pg. 2.

3. At the hearing on this matter on December 6, 2014, EDWARDS' counsel focused attention on one of the troubling "implications" of EPSTEIN'S confidentiality prohibition—the restriction imposed on EDWARDS' ability to communicate all of the details of his settlement with EPSTEIN to multiple clients on whose behalf he was actively litigating a Federal Crime Victims Rights Act proceeding directly challenging the validity of EPSTEIN'S deal with federal prosecutors which, if successful, has the potential of subjecting both EPSTEIN and his associates to multiple federal felony charges.

4. The other primary argument presented on EDWARDS' behalf related to the unestablished value of confidentiality to EPSTEIN. It is with regard to this second argument that recent public disclosures have demonstrated the need to further discovery and require a stay of the resolution of the pending motion to allow for completion of that discovery.

5. On Friday, December 19, 2014, a report appeared in the public media alerting EDWARDS and his counsel for the first time of a substantial financial commitment made by EPSTEIN in an apparent effort to lessen the severe injuries to his public image suffered as a

**EDWARDS ADV. EPSTEIN**

**Case No.: 502009CA040800XXXXMBAG**

**Motion to Stay Proceedings Pending Completion of Additional Discovery**

consequence of the focus of international attention on his criminal conduct. (See Exhibit #1 attached).

6. How much time, effort and money EPSTEIN spent and committed to spend on public relations efforts is clearly relevant and material to the value he placed on BRADLEY EDWARDS' silence. If EDWARDS is able to demonstrate that EPSTEIN expended hundreds of thousands of dollars in money and services to combat adverse publicity, that information is probative of the value he himself placed on avoiding that publicity entirely by gagging BRADLEY EDWARDS.

7. Accordingly, BRADLEY EDWARDS seeks the opportunity to depose JEFFREY EPSTEIN regarding his public image-related expenditures and to obtain documentary evidence relevant to such expenditures.

8. Considering the pendency of the appeal on the underlying summary judgment issued in favor of EPSTEIN (Appellate Brief attached as Exhibit #2), EPSTEIN will suffer no harm by virtue of the requested stay.

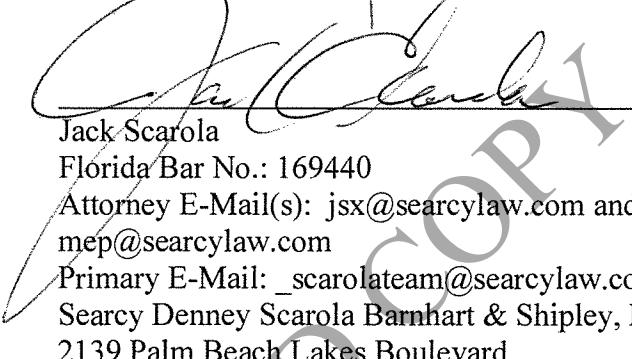
WHEREFORE, BRADLEY EDWARDS requests a stay of further briefing and hearings with regard to EPSTEIN'S Motion for Fees and Costs to permit the discovery described herein. Assuming EPSTEIN'S cooperation in the process of setting his deposition and responding to discovery requests, a stay of 60 days is expected to be adequate.

**EDWARDS ADV. EPSTEIN**

Case No.: 502009CA040800XXXXMBAG

**Motion to Stay Proceedings Pending Completion of Additional Discovery**

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 5<sup>th</sup> day of JANUARY, 2015.

  
Jack Scarola

Florida Bar No.: 169440

Attorney E-Mail(s): [jsx@searcylaw.com](mailto:jsx@searcylaw.com) and [mep@searcylaw.com](mailto:mep@searcylaw.com)

Primary E-Mail: [scarolateam@searcylaw.com](mailto:scarolateam@searcylaw.com)

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: (561) 383-9451

Attorneys for EDWARDS

**EDWARDS ADV. EPSTEIN**

Case No.: 502009CA040800XXXXMBAG

Motion to Stay Proceedings Pending Completion of Additional Discovery

**COUNSEL LIST**

Marc S. Nurik, Esquire  
marc@nuriklaw.com  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954)-745-5849  
Fax: (954)-745-3556  
Attorneys for Scott Rothstein

William Chester Brewer, Esquire  
wcblaw@aol.com; wcbcg@aol.com  
250 S Australian Avenue, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-655-4777  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Jack A. Goldberger, Esquire  
jgoldberger@agwpa.com;  
smahoney@agwpa.com  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue S, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

John R. Beranek, Esquire  
jberanek@ausley.com;  
csullivan@ausley.com  
Ausley & McMullen  
123 South Calhoun Street  
Tallahassee, FL 32301  
Phone: (850)-224-9115  
Fax: (850)-222-7560  
Attorneys for Jeffrey Epstein

Andrew A. Harris, Esquire  
aah@FLAppellateLaw.com;  
jew@FLAppellateLaw.com;  
Burlington & Rockenbach  
444 W Railroad Avenue, Suite 430  
West Palm Beach, FL 33401  
Phone: (561)-721-0400  
Fax: (561)-721-0465  
Attorneys for Bradley Edwards

Bradley J. Edwards, Esquire  
staff.efile@pathtojustice.com  
Farmer Jaffe Weissing Edwards Fistos  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954)-524-2820  
Fax: (954)-524-2822

Fred Haddad, Esquire  
Dee@FredHaddadLaw.com;  
Fred@FredHaddadLaw.com  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: (954)-467-6767  
Fax: (954)-467-3599  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire  
tonja@tonjahaddad.com;  
efiling@tonjahaddad.com  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: (954)-467-1223  
Fax: (954)-337-3716  
Attorneys for Jeffrey Epstein

WEST PALM BEACH — Multi-millionaire sex offender **Jeffrey Epstein** is suing a Los Angeles public relations agency in a West Palm Beach court over the firm's attempt to collect \$155,000 from him.

It's yet another *Gossip Extra* scoop: Palm Beacher Epstein, 61, who was convicted of soliciting underage girls from the area's poorer suburbs for prostitution, claims in court papers here he wasn't served properly the judgment won by Sitrick & Co. in a previous Los Angeles court action.

It seems that the Wall Street prodigy Epstein hired Sitrick to clean up the public relations mess he created when he and Brit Prince **Andrew** were photographed together in Central Park in 2011 in NYC.

The London press went berserk when it found out Andrew hung out with a man forced to register as a sex offender in 2008 for his sexual hijinx with underage girls in his Palm Beach dungeon!

In suing Sitrick, Epstein now claims he doesn't live at 358 El Brillo Way in Palm Beach, where a process-server dropped the papers, but in the U.S. Virgin Islands.

We checked. And while Palm Beach property records show the \$8 million-house on El Brillo is still owned by Epstein, the state's sexual offender tracking system shows Epstein indeed is in his home in St. Thomas, V.I.

**Michele Dargan**  
*Staff Writer*  
Palm Beach Daily News

