

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.

THE PARTIES' NOTICE OF PENDING MOTIONS
TO BE HEARD AT SPECIAL SET HEARINGS

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), and Defendant/Counter-Plaintiff, Bradley J. Edwards ("Edwards"), pursuant to the parties' agreement and in response to this Court's November 14, 2017, Order Granting Epstein's Motion for Continuance of Trial, hereby provide the Court with the following list of pending Motions to be heard at the special set hearings on November 29, 2017 (10:00 a.m. – 3:00 p.m.), December 5, 2017 (10:00 a.m. – 3:00 p.m.) and December 7, 2017 (10:00 a.m. – 12:00 p.m.):

Sequence	Motion	Time for Motion ¹	Time for Response
	Issue No. 1 to be determined: Evidentiary implications of Epstein's assertion of the Fifth Amendment privilege. There are multiple motions that raise a number of issues that this Court must resolve. The parties agree that the Fifth Amendment related motions should be determined first by the Court. <i>See</i> Items 1-3 below.		

¹ Movant will reserve rebuttal time from the total amount allotted for the Motion.

Sequence	Motion	Time for Motion ¹	Time for Response
1 ²	11/17/17 Epstein's Revised Omnibus Motion in Limine ³ <ul style="list-style-type: none"> • 9/28/17, Edwards' Response • Edwards' Response to Epstein's Revised Motion is Outstanding 	1.5 hours	1.5 hours
2	9/25/17, Edwards' Motion in Limine to Strike the June 30, 2017, Affidavit of Jeffrey Epstein and to Exclude Evidence as to Which Discovery was Withheld Under Claims of Privilege ⁴ <ul style="list-style-type: none"> • 10/13/17, Epstein's Response • 10/20/17, Edwards' Reply 	1.5 hours	1.5 hours
3	11/13/17, Edwards' Motion in Limine Addressing Scope of Admissible Evidence <ul style="list-style-type: none"> • Epstein's Response Outstanding 	1.5 hours	1.5 hours
4	10/4/17, Epstein's Motion for Temporary Stay of Proceedings <ul style="list-style-type: none"> • 10/10/17 Edwards' Response • 10/17/17 Edwards' Supplemental Response 	20 minutes	20 minutes
5	11/3/17, Epstein's Motion to Amend Answer and Affirmative Defenses to the Fourth Amended Counterclaim <ul style="list-style-type: none"> • Edwards' Response Outstanding 	20 minutes	20 minutes
6	11/6/17, Epstein's Supplemental Motion to Compel Discovery <ul style="list-style-type: none"> • 11/15/17, Edwards' Response <p><u>This Motion Supplements:</u></p> <ul style="list-style-type: none"> • 9/25/17, Epstein's Motion to Compel Discovery Responses from Edwards • 9/28/17, Edwards' Memorandum in Opposition • 9/25/17, Epstein's Motion to Strike Edwards' Discovery Objections and to Compel Responses • 9/28/17, Edwards' Response 	2.5 hours	2.5 hours
7	10/26/17, Edwards' Motion for Protective Order (Courtney Wild) <ul style="list-style-type: none"> • Epstein's Response Outstanding 	20 minutes	20 minutes

² Motions listed as 1 and 2 overlap the issue of the Fifth Amendment which both parties agree necessarily should be addressed at the outset.

³ Epstein's Revised Omnibus Motion in Limine amends his Omnibus Motion in Limine filed on September 25, 2017.

⁴ Epstein believes the Motion to Strike the Affidavit was deemed moot at the October 3, 2017, hearing on Epstein's Motion for Summary Judgment and only the Fifth Amendment issues remain outstanding.

Sequence	Motion	Time for Motion ¹	Time for Response
8	9/21/17, Edwards' (four) Motions to Compel Substantive Responses to Discovery • Epstein's Responses Outstanding	1.5 hours	1.5 hours
9	11/8/17, Edwards' Request for Judicial Notice Pursuant to Florida Statutes Section 90.202 and 90.203 • 11/17/17, Epstein's Objection	20 minutes	20 minutes
10	10/5/17, Epstein's Motion for Sanctions Pursuant to Violation of Confidential Settlement Agreement Against Edwards and his Counsel • 11/8/17, Edwards' Response	45 minutes	45 minutes

DATED: November 17, 2017.

SEARCY, DENNY, SCAROLA,
BARNHART & SHIPLEY, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
(561) 686-6300; (561) 383-9451 [fax]

By: /s/ Jack Scarola, with permission
Jack Scarola (FBN 169440)
mep@searcylaw.com
jsx@searcylaw.com
scarolateam@searcylaw.com
Co-Counsel for Defendant/Counter-
Plaintiff Bradley J. Edwards

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, FL 33401
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link
Scott J. Link (FBN 602991)
Kara Berard Rockenbach (FBN 44903)
Angela M. Many (FBN 26680)
Primary: Scott@linkrocklaw.com
Primary: Kara@linkrocklaw.com
Primary: Angela@linkrocklaw.com
Secondary: Tina@linkrocklaw.com
Secondary: Troy@linkrocklaw.com
Secondary: Tanya@linkrocklaw.com
Secondary: Eservice@linkrocklaw.com
Trial Counsel for Plaintiff/Counter-
Defendant Jeffrey Epstein

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 17, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, Florida 33401
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

Scott J. Link (FBN 602991)

Kara Berard Rockenbach (FBN 44903)

Angela M. Many (FBN 26680)

Primary: Scott@linkrocklaw.com

Primary: Kara@linkrocklaw.com

Primary: Angela@linkrocklaw.com

Secondary: Tina@linkrocklaw.com

Secondary: Troy@linkrocklaw.com

Secondary: Tanya@linkrocklaw.com

Secondary: Eservice@linkrocklaw.com

Trial Counsel for Plaintiff/Counter-Defendant

Jeffrey Epstein

SERVICE LIST

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart & Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <u>mep@searcylaw.com</u> <u>jsx@searcylaw.com</u> <u>scarolateam@searcylaw.com</u> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington & Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <u>njs@FLAppellateLaw.com</u> <u>ktb@FLAppellateLaw.com</u> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33401 <u>brad@epllc.com</u> <u>staff.efile@pathotojustice.com</u> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <u>marc@nuriklaw.com</u> <i>Counsel for Defendant Scott Rothstein</i></p>

<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 tonja@tonjahaddad.com efiling@tonjahaddad.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>	<p>Fred Haddad Haddad & Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 dee@haddadandnavarrolaw.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>
<p>Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>	

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