

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 <sup>1</sup>	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.		

<sup>1</sup> Movant will reserve rebuttal time from the total amount allotted for the Motion.

Sequence	Motion	Time for Motion <sup>1</sup>	Time for Response
1 <sup>2</sup>	11/17/17 Epstein's Revised Omnibus Motion in Limine <sup>3</sup> <ul style="list-style-type: none"> <li>9/28/17, Edwards' Response</li> <li>Edwards' Response to Epstein's Revised Motion is Outstanding</li> </ul>	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 <sup>4</sup> <ul style="list-style-type: none"> <li>10/13/17, Epstein's Response</li> <li>10/20/17, Edwards' Reply</li> </ul>	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"> <li>Epstein's Response Outstanding</li> </ul>	1.5 hours	1.5 hours
4	10/4/17, Epstein's Motion for Temporary Stay of Proceedings <ul style="list-style-type: none"> <li>10/10/17 Edwards' Response</li> <li>10/17/17 Edwards' Supplemental Response</li> </ul>	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"> <li>Edwards' Response Outstanding</li> </ul>	20 minutes	20 minutes
6	11/6/17, Epstein's Supplemental Motion to Compel Discovery <ul style="list-style-type: none"> <li>11/15/17, Edwards' Response</li> </ul> <u>This Motion Supplements:</u> <ul style="list-style-type: none"> <li>9/25/17, Epstein's Motion to Compel Discovery Responses from Edwards</li> <li>9/28/17, Edwards' Memorandum in Opposition</li> <li>9/25/17, Epstein's Motion to Strike Edwards' Discovery Objections and to Compel Responses</li> <li>9/28/17, Edwards' Response</li> </ul>	2.5 hours	2.5 hours
7	10/26/17, Edwards' Motion for Protective Order (Courtney Wild) <ul style="list-style-type: none"> <li>Epstein's Response Outstanding</li> </ul>	20 minutes	20 minutes

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

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

<sup>4</sup> 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 <sup>1</sup>	Time for Response
8	9/21/17, Edwards' (four) Motions to Compel Substantive Responses to Discovery <ul style="list-style-type: none"> <li>Epstein's Responses Outstanding</li> </ul>	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 <ul style="list-style-type: none"> <li>11/17/17, Epstein's Objection</li> </ul>	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 <ul style="list-style-type: none"> <li>11/8/17, Edwards' Response</li> </ul>	45 minutes	45 minutes

DATED: November 17, 2017.

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## **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).

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