

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

CASE NO.: 502009CA040800XXXXMBA

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: HAFELE

vs.

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

Defendants/Counter-Plaintiff,

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION TO
STRIKE PORTIONS OF DEFENDANT/COUNTER-PLAINTIFF BRADLEY
EDWARDS'S WITNESS LIST OR COMPEL PROPER RESPONSES IN
ACCORDANCE WITH THIS COURT'S ORDER**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph IV of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures and the *Florida Rules of Civil Procedure*, moves this Court to strike the portions of Defendant/Counter-Plaintiff Bradley Edwards ("Edwards") "witnesses" listed below and prevent use of any of the witnesses at trial for his failure to comply with this Court's Order. Alternatively, Epstein requests that this Court compel Edwards to comply with this Court's Order and modify all subsequent deadline dates so as to not prejudice Epstein in preparation for trial or seeking additional discovery. In support thereof, Epstein states:

INTRODUCTION

Edwards noticed this matter for trial on December 3, 2015. On February 8, 2016, this Court entered an Order setting trial in this matter for the trial period of August 29, 2016 through November 4, 2016. After receiving same, Epstein moved to stay this matter or alternatively continue the trial date until such time as the Florida Supreme Court ruled on the Litigation Privilege issue. This Court denied Epstein's first Motion, without prejudice. As the trial date approached, Epstein filed a renewed Motion to stay or continue the trial date, and after hearing on Epstein's Motion, this Court entered an Order resetting this case for the October 24, 2016 trial period, and further ordered that the initial trial order dates be adjusted in accordance therewith. A true and correct copy of the initial Court Order Setting Jury Trial and Directing Pretrial and Mediation Procedures (hereinafter "Order"), and the Order resetting the trial period, are attached hereto as composite "Exhibit A."

Pursuant to the Order's amended dates, the parties were to "exchange lists of all trial exhibits, names and addresses of all trial witnesses, and names and addresses of all expert witnesses." *See Exhibit A*, ¶ II.A (emphasis added). While Epstein provided a proper witness list, containing the names and addresses of all witnesses, Edwards provided a list that failed to provide a proper name or address for several witnesses, including *any* expert witness, which is delineated in detail below. This is the third time that Edwards has filed this witness list with the same deficiencies, and the third time that Epstein has sought intervention from the Court. Edwards consistently espouses readiness for trial, notwithstanding his repeated and blatant failure to comply with the Order. As demonstrated more fully herein, Edwards's actions prejudice the administration of justice,

thwart Epstein's ability to timely receive discovery and adequately prepare for trial, and blatantly violate the Court's Order.

ITEMS TO BE STRICKEN OR AMENDED TO INCLUDE PROPER RESPONSES

Edwards's witness list contains twenty-eight (28) numbered paragraphs. A true and correct copy of same is attached hereto as "Exhibit B." Paragraphs one (1) through seven (7) contain proper names and addresses. Conversely, paragraphs eight (8) through seventeen (17) and paragraphs nineteen (19) and twenty (20) contain proper names only and no addresses, and the remaining paragraphs with which Epstein takes issue provide merely the following:

18. Any and all FBI agents who assisted in the investigation of Jeffrey Epstein.
21. All victims identified in the local, state and federal investigations.
22. All attorneys who have prosecuted claims against Jeffrey Epstein on behalf of other victims.
23. All other named victims.
24. All persons referenced in Edwards' Motion for Summary Judgment.
27. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards. *See Exhibit B.*

Likewise, Edwards Expert Witness list provides as follows: "Experts include all listed attorneys involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females." There are no attorneys listed. A true and correct copy of Edwards' Amended Expert Witness List is attached hereto as "Exhibit C."

While it is likely that these witnesses, based upon the "description" given of them, have no relevant or admissible information to provide regarding the elements that Edwards

must prove in his claim for Malicious Prosecution against Epstein, Epstein cannot properly determine or evaluate that issue without knowing, at least, the purported witnesses names and, if warranted, engaging in discovery regarding each person thereafter.

MEMORANDUM OF LAW

This Court's Order clearly and unequivocally delineates the Pretrial rules with which the parties must comply and the required parameters for such compliance. *See* Exhibit A. Paragraph IV governs Noncompliance, and provides: **"NONCOMPLIANCE WITH ANY PORTION OF THIS ORDER MAY RESULT IN THE STRIKING OF THE CASE, WITNESSES, OR EXHIBITS, OR IMPOSITION OF SUCH OTHER SANCTIONS AS ARE JUST."** (Emphasis in original). *See* Exhibit A. In the case at hand, Edwards's witness list clearly violates this Court's Order, just as it did the last two (2) times he filed it. This Court's Order requires that Edwards provide "names and addresses of all trial witnesses." *See Exhibit A*. Edwards's serial disregard of this Order by failing to provide proper names and addresses in each of three witness lists he filed in this matter, despite repeated requests by Epstein to correct that failure, mandate the implementation of the remedies set forth in Paragraph IV of the Order and the *Florida Rules of Civil Procedure* governing discovery violations.

The law is clear that "[e]xcept in cases of a clear abuse of discretion prejudicial to the affected party, trial courts must be allowed to enforce pretrial orders to achieve the orderly and efficient administration of justice, fair to all parties." *Fla. Marine Enterprises v. Bailey*, 632 So. 2d 649, 651-52 (Fla. 4th DCA 1994). Courts have held that "decisions regarding the testimony of improperly disclosed witnesses" are squarely "within the broad discretion of the trial judge, who is vested with the interpretation and enforcement of any

pretrial order mandating witness disclosure.” *Id.* at 651. “Florida courts have explained that the rules of discovery are intended to avoid surprise and trial by ambush.” *Agrofollajes, S.A. v. E.I. Du Pont De Nemours & Co., Inc.*, Nos. 3D07-2322, 3D07-2318, 3D07-1036, 2009 WL 4828975, at (Fla. 3d DCA Dec. 16, 2009); *Escutia v. Greenleaf Products, Inc.*, 886 So. 2d 1059, 1062 (Fla. 1st DCA 2004). Here, it is undeniable that Edwards’s failure to provide proper names of individual witness for the last four (4) years prejudices Epstein, and thwarts the efficiency of the judicial process.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this June 28, 2017.

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

CIRCUIT CIVIL DIVISION AG
CASE NO. 50-2009-CA-040800-XXXX-MB

JEFFREY EPSTEIN,
Plaintiff(s)

v.

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

Defendant(s).

**ORDER SETTING JURY TRIAL AND
DIRECTING PRETRIAL AND MEDIATION PROCEDURES**

I. SCHEDULING

This action is set for jury trial for the trial period of AUGUST 29, 2016 through NOVEMBER 4, 2016. YOU MUST APPEAR ON AUGUST 19, 2016 AT 9:00 A.M. IN COURTROOM 9C, PALM BEACH COUNTY COURTHOUSE, 205 NORTH DIXIE HIGHWAY, WEST PALM BEACH, FLORIDA FOR THE CALENDAR CALL.

(10 days have been reserved for the trial of this cause).

The trial will be scheduled sometime during the calendar, at a date and time to be provided at the calendar call, subject to the court's ordering a later case setting.

II. UNIFORM PRETRIAL PROCEDURE

- A. On the last business day no later than 60 DAYS PRIOR TO CALENDAR CALL, the parties shall exchange lists of all trial exhibits, names and addresses of all trial witnesses, and names and addresses of all expert witnesses.
- B. On the last business day no later than 50 DAYS PRIOR TO CALENDAR CALL, the parties shall exchange lists of names and addresses of all rebuttal witnesses.

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C. In addition to names and addresses of each expert retained to formulate an expert opinion with regard to this cause, both on the initial listing and on rebuttal, the parties shall provide:

1. the subject matter about which the expert is expected to testify;
2. the substance of the facts and opinions to which the expert is expected to testify;
3. a summary of the grounds for each opinion;
4. a copy of any written reports issued by the expert regarding this case; and
5. a copy of the expert's curriculum vitae.

D. On the last business day no later than 30 DAYS PRIOR TO CALENDAR CALL, the parties shall confer and:

1. discuss settlement;
2. simplify the issues and stipulate, in writing, as to as many facts and issues as possible;
3. prepare a Pre-Trial Stipulation in accordance with paragraph E; and
4. list all objections to trial exhibits.

E. PRETRIAL STIPULATIONS MUST BE FILED. It shall be the duty of counsel for the Plaintiff to see that the Pre-Trial Stipulation is drawn, executed by counsel for all parties, and filed with the Clerk no later than 20 DAYS PRIOR TO CALENDAR CALL. UNILATERAL PRETRIAL STATEMENTS ARE DISALLOWED, UNLESS APPROVED BY THE COURT, AFTER NOTICE AND HEARING SHOWING GOOD CAUSE. Counsel for all parties are charged with good faith cooperation in this regard. The Pre-Trial Stipulation shall contain in separately numbered paragraphs:

1. a list of all pending motions including MOTIONS IN LIMINE and DAUBERT MOTIONS requiring action by the Court and the dates those motions are set for hearing (MOTIONS IN LIMINE shall not be heard the day of trial or thereafter). All Daubert Motions must be heard 20 days before the start of the trial.
2. stipulated facts which require no proof at trial which may be read to the trier of fact;
3. a statement of all issues of fact for determination at trial;
4. each party's numbered list of trial exhibits with specific objections, if any, to schedules attached to the Stipulation;
5. each party's numbered list of trial witnesses with addresses (including all known rebuttal witnesses); the list of witnesses shall be on separate schedules attached to the Stipulation;
6. a statement of estimated trial time;
7. names of attorneys to try case;
8. number of peremptory challenges per party; and
9. each party's proposed jury instructions and verdict form, with citations to supporting authority, as schedules attached to the Stipulation.

- F. FILING OF PRE-TRIAL STIPULATION. Failure to file the Pre-Trial Stipulation or a Court Approved Unilateral Stipulation as above provided may result in the case being stricken from the Court's calendar at its sounding or other sanctions.
- G. ADDITIONAL EXHIBITS, WITNESSES OR OBJECTIONS. At trial, the parties shall be strictly limited to exhibits and witnesses disclosed and objections reserved on the schedules attached to the Pre-Trial Stipulation prepared in accordance with paragraphs D and E, absent agreement specifically stated in the Pre-Trial Stipulation or order of the Court upon good cause shown. Failure to reserve objections constitutes a waiver. A party desiring to use an exhibit or witness discovered after counsel have conferred pursuant to paragraph D shall immediately furnish the Court and other counsel with a description of the exhibit or with the witness' name and address and the expected subject matter of the witness' testimony, together with the reason for the late discovery of the exhibit or witness. Use of the exhibit or witness may be allowed by the Court for good cause shown or to prevent manifest injustice.
- H. DISCOVERY. Unless otherwise agreed in the Pre-Trial Stipulation, all discovery must be completed no later than 10 DAYS BEFORE THE DATE SET FOR CALENDAR CALL, absent agreement for later discovery specifically stated in the Pre-Trial Stipulation or for other good cause shown. ABSENT A TRUE EMERGENCY, FAILURE TO COMPLETE DISCOVERY SHALL NOT CONSTITUTE GROUNDS FOR CONTINUANCE.
- I. PRE-TRIAL CONFERENCE. No pre-trial conference pursuant to Fla. R. Civ. P. 1.200 is set by the Court on its own motion. If a pre-trial conference is set upon motion of a party, counsel shall meet and prepare a stipulation pursuant to paragraphs D and E and file the stipulation no later than 5 DAYS BEFORE THE CONFERENCE. Failure to request a pre-trial conference in a timely fashion constitutes a waiver of the notice of requirement of Rule 1.200. Motions for Summary Judgment will not be heard at any pre-trial conference.
- J. UNIQUE QUESTIONS OF LAW. Prior to calendar call, counsel for the parties are directed to exchange and simultaneously submit to the Court appropriate memoranda with citations to legal authority in support of any unique legal questions which may reasonably be anticipated to arise during the trial.
- K. MODIFICATION TO UNIFORM PRE-TRIAL PROCEDURE. Upon written stipulation of the parties filed with the court, the Pre-Trial Procedure, except for items II D-F, inclusive, may be modified in accordance with the parties' stipulation, except to the extent that the stipulation may interfere with the Court's scheduling of the matter for trial or hinder the orderly progress of the trial.

L. **PREMARKING EXHIBITS.** Prior to trial, each party shall meet with and assist the clerk in marking for identification all exhibits, as directed by the clerk.

M. **DEPOSITION DESIGNATIONS.** No later than **20 DAYS PRIOR TO CALENDAR CALL**, each party shall serve his, her, or its designation of depositions, or portions of depositions, each intends to offer as testimony in his, her or its case in chief. No later than **10 DAYS PRIOR TO CALENDAR CALL**, each opposing party shall serve his, her, or its counter (or "fairness") designations to portions of depositions designated, together with objections to the depositions, or portions thereof, originally designated. No later than calendar call, each party shall serve his, her or its objections to counter designations served by an opposing party.

III. **MEDIATION**

A. All parties are required to participate in mediation.

1. The appearance of counsel who will try the case and representatives of each party with full authority to enter into a complete compromise and settlement is mandatory. If insurance is involved, an adjuster with authority up to the policy limits or the most recent demand, whichever is lower, shall attend.
2. At least **ONE WEEK BEFORE THE CONFERENCE**, all parties shall file with the mediator a brief, written summary of the case containing a list of issues as to each party. If an attorney or party filing the summary wishes its content to remain confidential, he/she must advise the mediator in writing when the report is filed.
3. All discussions, representations, and statements made at the mediation conference shall be privileged consistent with Florida Statutes sections 44.102 and 90.408.
4. The mediator has no power to compel or enforce a settlement agreement. If a settlement is reached, it shall be the responsibility of the attorneys or parties to reduce the agreement to writing and to comply with Florida Rule of Civil Procedure 1.730(b), unless waived.

B. The Plaintiff's attorney shall be responsible for scheduling mediation. The parties should agree on a mediator. If they are unable to agree, any party may apply to the Court for appointment of a mediator in conformity with Rule 1.720 (f), Fla. R. Civ. P. The lead attorney or party shall file and serve on all parties and the mediator a Notice of Mediation giving the time, place, and date of the mediation and the mediator's name. The mediator shall be paid \$175.00 per hour, unless otherwise agreed by the parties.

C. Completion of mediation prior to calendar call is a prerequisite to trial. If mediation is not conducted, or if a party fails to participate in mediation, the case, at the Court's discretion, may be stricken from the trial calendar, pleadings may be stricken, and other sanctions may be imposed.

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D. Any party opposing mediation may proceed under Florida Rule of Civil Procedure 1,700(b).

IV. NONCOMPLIANCE

NONCOMPLIANCE WITH ANY PORTION OF THIS ORDER MAY RESULT IN THE STRIKING OF THE CASE, WITNESSES, OR EXHIBITS, OR IMPOSITION OF SUCH OTHER SANCTIONS AS ARE JUST.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this 8th day of February, 2016.



DONALD W. HAFELE
Circuit Judge

Copies furnished to:

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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,

Defendant,

**SECOND AMENDED AND SUPPLEMENTAL WITNESS LIST OF
COUNTERPLAINTIFF BRADLEY J. EDWARDS**

Pursuant to this Court's Order Setting Trial and Directing Pretrial and Mediation Procedures dated February 8, 2016, Counter-plaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys, hereby files his Second Amended and Supplemental Witness List for trial as follows:

1. Bradley J. Edwards
2. Jeffrey Epstein
3. Avarell Cordero
140 W End Avenue Apt. 30B
New York, NY 10023
4. Alan Dershowitz
Hauser Hall 520 1575
Massachusetts Avenue
Cambridge, MA 02138

EXHIBIT B

Edwards adv. Epstein

Case No.: 502009CA040800XXXXMBAG

Second Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

Page 2 of 5

5. Donnie Ingram
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6. Robert Josefsberg, Esquire
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7. Howard Rubinstein
1345 Avenue of the Americas, 30th
Floor New York, NY 10105
8. Steven Hoffenberg
9. Johanna Sjoberg
10. Juan Alessi
11. Maria Alessi
12. Dave Rogers (pilot)
13. Sarah Kellen
14. Nadia Marcinkova
15. Nadia Bjorlin
16. Dana Burns
17. Marie Villafana (US Attys Office)
18. Any and all FBI agents who assisted in the investigation of Jeffrey Epstein
19. Detective Recarey
20. Palm Beach Police Chief Reiter
21. All victims identified in the local, state and federal investigations

22. All attorneys who have prosecuted claims against Jeffrey Epstein on behalf of other victims
23. All other named victims.
24. All persons referenced in Edwards' Motion for Summary Judgment.
25. All witnesses listed by the Counterdefendant and Co-Defendant.
26. All experts named by the Counterdefendant and Co-Defendant.
27. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards.
28. Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.

EXPERTS

Experts include all listed witnesses involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females.

Counter-plaintiff reserves the right to amend this list prior to trial upon proper notice to the Counter-defendant.

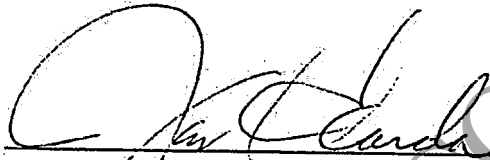
Edwards adv. Epstein

Case No.: 502009CA040800XXXXMBAG

Second Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

Page 4 of 5

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 15th day of AUGUST, 2016.



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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

AMENDED EXPERT WITNESS LIST OF BRADLEY J. EDWARDS

Bradley J. Edwards, by and through his undersigned attorneys, hereby amends his expert witness list for trial as follows:

Experts include all listed attorneys involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females.

They will testify based upon their background, training, and experience as civil litigators, and the personal involvement that each had in prosecuting claims against Jeffrey Epstein, about the legal and ethical propriety of the actions taken by Bradley Edwards in fulfilling his obligations to the victims of Epstein's criminal assaults.

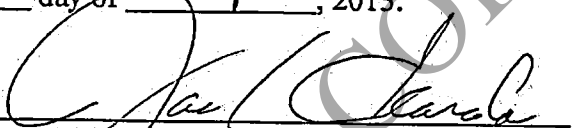
All expert witnesses timely listed by Jeffrey Epstein, subject to Edwards' objections.

Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.

Edwards adv. Epstein
Amended Expert Witness List
Case No.: 502009CA040800XXXXMBAG

Bradley J. Edwards reserves the right to amend this list prior to trial upon proper notice to counsel for Jeffrey Epstein.

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 27th day of Sept, 2013.



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Amended Expert Witness List
Case No.: 502009CA040800XXXXMBAG

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