

#291874/mep

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).

**DEFENDANT/COUNTERPLAINTIFF, EDWARDS', MOTION FOR LEAVE TO
ASSERT CLAIM FOR PUNITIVE DAMAGES**

Counter-plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an Order granting him leave to assert a claim for punitive damages against the Counter-defendant, JEFFREY EPSTEIN, and in support thereof would show that the record evidence presented to the Court in support of Edwards' Motion for Summary Judgment satisfies the statutory prerequisites for the assertion of a punitive damage claim. Specifically, the evidence establishes that EPSTEIN's Complaint against EDWARDS;

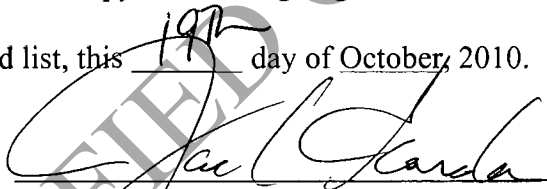
1. was filed in the total absence of evidence to support any allegation of wrongdoing on the part of EDWARDS;
2. was filed in the total absence of evidence that EPSTEIN had sustained damage as a consequence of any misconduct other than his own well-established criminal enterprise;

2010 OCT 19 PM 3:25
CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Motion for Leave to Assert Claim for Punitive Damages

3. was filed in the absence of any intention to meet his own obligation to provide relevant and material discovery;
4. was filed for the sole purpose of attempting to intimidate both EDWARDS and EDWARDS' clients and others into abandoning their legitimate claims against EPSTEIN.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 19th day of October, 2010.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for BRADLEY J. EDWARDS

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Motion for Leave to Assert Claim for Punitive Damages

COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: (561) 659-8300
Fax: (561) 835-8691

Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954) 524-2820
Fax: (954) 524-2822

Marc S. Nurik, Esquire
Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: (954) 745-5849
Fax: (954) 745-3556

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, P.A.
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: (561) 727-2423
Fax: (561) 802-9976