

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

STATE OF FLORIDA,

vs.

Case Nos. 2006-CF9454 AXX

JEFFREY EPSTEIN,

Defendant.

FILED

2009 JUL -6 AM 11:26

NONPARTY [REDACTED] MOTION FOR ATTORNEYS FEES AND COSTS

[REDACTED], a nonparty, moves pursuant to Administrative Rule 2.303 for attorneys fees and costs on the following grounds:

1. [REDACTED] is filed a motion to vacate the agreed order sealing records and to unseal the nonprosecution agreement and addendum in this file. Also, [REDACTED] opposed defendant's motion to unseal said records. [REDACTED] motion was granted and defendant's was denied at hearing on June 26, 2009.

2. [REDACTED] is entitled to an award of reasonable attorneys fees and costs pursuant to said Administrative Rule. Defendant's motion to seal and his opposition to [REDACTED] motion were not made in good faith and were not supported by a sound legal or factual basis.

3. [REDACTED] adopts and incorporates by reference all arguments in the motion for fees filed by The Palm Beach Post.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via U.S. Mail this 2nd day of July, 2009 to: Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401;

Michael McAuliffe, Esq. and Judith Stevenson Arco, Esq., State Attorney's Office-West Palm Beach, 401 North Dixie Highway, West Palm Beach, FL 33401; and Deanna K. Shullman, Esq. and James B. Lake, Esq., 101 N.E. Third Avenue, Suite 1500, Fort Lauderdale, FL 33301.

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