

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 SUPPLEMENTAL RESPONSE TO  
EPSTEIN'S REQUEST TO PRODUCE PURSUANT TO COURT ORDER**

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys, files this Second Supplemental Response to EPSTEIN'S Request to Produce in compliance with this Court's Order, and states as follows:

1. Copies of materials previously produced to counsel for EPSTEIN on May 8, 2012 are attached as Composite Exhibit A. Some of the produced documents contain privilege redactions as noted.
2. This production was culled by electronic search of approximately 28,000 documents released to EDWARDS by the RRA Bankruptcy Trustee.
3. The documents contained within Composite Exhibit A and those documents listed on the privilege log attached as Composite Exhibit B, together comprise the complete universe of responsive documents within EDWARDS' possession, custody and control.

SHARON R. BOCK, CLERK  
PALM BEACH COUNTY  
CIRCUIT CIVIL

2012 AUG -8 PM 2:15

FILED

Edwards adv. Epstein

Case No.: 502009CA040800XXXXMBAG

Second Supplemental Response to Epstein's Request to Produce Pursuant to Court Order

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4. EDWARDS' reaffirms the accuracy of EDWARDS' Supplemental Response to Request to Produce previously filed on June 8, 2012 and attached as Exhibit C.
5. EDWARDS' employment with RRA commenced in approximately April of 2009, and he has retained no electronic communications from prior to that period.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic and U.S. Mail to all counsel on the attached list, this 7<sup>th</sup> day of August, 2012.

  
\_\_\_\_\_  
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docs  
Responsive  
to ORDER

EDWARDS ADV. EPSTEIN

EXHIBIT A

1 of 164

5-07-2012

**BRAD EDWARDS – PRIVILEGE LOG**  
**EMAILS DATED NOVEMBER 2009 TO AUGUST 2010**

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
...Emails01	05/22/2010 9:53am	Bradley Edwards	Conchita Sarnoff	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails01	05/22/2010 9:10am	Conchita Sarnoff	Bradley Edwards	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails01- 02	05/22/2010 8:47am	Bradley Edwards	Conchita Sarnoff	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails02	05/21/2010 12:44pm	Bradley Edwards	Conchita Sarnoff	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails03	6/2/2010 11:50 am	Bradley Edwards; Spencer Kuvin; Mike Fisten	Conchita Sarnoff	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails03	6/2/2010 10:49 am	Conchita Sarnoff; Spencer Kuvin; Mike Fisten	Bradley Edwards	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege

**BRAD EDWARDS – PRIVILEGE LOG**  
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<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
					privilege
...Emails03-04	6/2/2010 10:42 am	Conchita Sarnoff	Bradley Edwards; Spencer Kuvin; Mike Fisten	Epstein moving assets and sex trafficking	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails05	6/7/2010 8:01pm	Brad Edwards	Conchita Sarnoff	Investigation of other potential witnesses.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails06	6/8/2010 11:30am	Brad Edwards	Conchita Sarnoff	Location Witnesses of	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails06	6/8/2010 10:13am	Conchita Sarnoff	Brad Edwards	Location Witnesses of	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails06	6/8/2010 9:52am	Brad Edwards	Conchita Sarnoff	Location Witnesses of	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails06	6/8/2010 9:27am	Conchita Sarnoff	Brad Edwards	Location Witnesses of	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege

**BRAD EDWARDS – PRIVILEGE LOG**  
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<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
					privilege
...Emails07	6/8/2010 9:27am	Brad Edwards	Conchita Sarnoff	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails07	6/8/2010 8:55am	Conchita Sarnoff	Brad Edwards	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails07	6/8/2010 8:40am	Brad Edwards	Conchita Sarnoff	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails07	6/8/2010 8:26am	Conchita Sarnoff	Brad Edwards	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails08	6/8/2010 8:10am	Brad Edwards	Conchita Sarnoff	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails08	6/7/2010 21:57 am	Conchita Sarnoff	Brad Edwards	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product

**BRAD EDWARDS – PRIVILEGE LOG**  
**EMAILS DATED NOVEMBER 2009 TO AUGUST 2010**

<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
					privilege
...Emails08	6/7/2010 8:24am	Brad Edwards	Conchita Sarnoff	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails08	6/7/2010 20:06	Conchita Sarnoff	Brad Edwards	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails08-9	6/7/2010 7:57Pm	Brad Edwards	Conchita Sarnoff	Location Witnesses	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails010	6/15/2010 12:38Pm	Brad Edwards	Conchita Sarnoff	Maritza Vazquez – Witness	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails011	6/16/2010 1:10pm	Brad Edwards; Spencer Kuvin; Peter Prieto	Conchita Sarnoff	Information child trafficking	re: sex Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails012	6/17/2010 11:37am	Brad Edwards	Conchita Sarnoff	Information child trafficking investigation preparation	re: sex and and for Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product

**BRAD EDWARDS – PRIVILEGE LOG**  
**EMAILS DATED NOVEMBER 2009 TO AUGUST 2010**

<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
					privilege
...Emails012	6/17/2010 11:19am	Conchita Sarnoff	Brad Edwards	Information re: child trafficking investigation and preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails012	6/17/2010 11:16am	Brad Edwards	Conchita Sarnoff	Information re: child trafficking investigation and preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails012	6/17/2010 10:53am	Conchita Sarnoff	Brad Edwards	Information re: child trafficking investigation and preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails012-013	6/17/2010 10:33am	Brad Edwards	Conchita Sarnoff	Information re: child trafficking investigation and preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails014	6/30/2010 11:22am	Brad Edwards; Mike Fisten	Conchita Sarnoff	Location of witnesses in preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails015	7/5/2010 2:27pm	Brad Edwards	Conchita Sarnoff	Location of witnesses in preparation for trial.	Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege

**BRAD EDWARDS – PRIVILEGE LOG**  
**EMAILS DATED NOVEMBER 2009 TO AUGUST 2010**

<b>BATES</b>	<b>DATE</b>	<b>TO</b>	<b>FROM</b>	<b>DESCRIPTION</b>	<b>OBJECTION</b>
...Emails015	7/5/2010 14:08	Conchita Sarnoff	Brad Edwards	Location witnesses preparation trial.	of in for Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails015-016	7/5/2010 2:03pm	Brad Edwards	Conchita Sarnoff	Location witnesses preparation trial.	of in for Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails016	7/5/2010 13:35	Conchita Sarnoff	Brad Edwards	Location witnesses preparation trial.	of in for Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails016	7/5/2010 1:30pm	Brad Edwards	Conchita Sarnoff	Location witnesses preparation trial.	of in for Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails017	7/9/2010 3:16pm	Brad Edwards	Conchita Sarnoff	Conclusion case.	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege
...Emails017	7/9/2010 13:44	Conchita Sarnoff	Brad Edwards	Conclusion case.	of Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege

**BRAD EDWARDS – PRIVILEGE LOG**  
**EMAILS DATED NOVEMBER 2009 TO AUGUST 2010**

<b><u>BATES</u></b>	<b><u>DATE</u></b>	<b><u>TO</u></b>	<b><u>FROM</u></b>	<b><u>DESCRIPTION</u></b>	<b><u>OBJECTION</u></b>
...Emails017	7/9/2010 1:36pm	Brad Edwards	Conchita Sarnoff	Conclusion of case.	privilege  Irrelevant- not reasonably calculated to lead to the discovery of admissible evidence and outside the time frame of Plaintiff's complaint. Work product privilege

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*Attorneys  
at Law*

**VIA EMAIL and U.S. MAIL**  
[tonja@tonjahaddadpa.com](mailto:tonja@tonjahaddadpa.com)

June 08, 2012

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OF COUNSEL  
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SHAREHOLDERS  
BOARD CERTIFIED

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1 KENTUCKY  
2 MAINE  
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4 MASSACHUSETTS  
5 MISSISSIPPI  
6 NEW HAMPSHIRE  
7 NEW JERSEY  
8 VIRGINIA  
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Re: Edwards adv. Epstein  
Our File No.: 291874

Dear Ms. Coleman:

Attached is our Supplemental Response to Request to Produce as that request was modified by Court Order of April 10, 2012. Upon receipt and review of this attachment, please inform us whether you intend to proceed with Monday's hearing.

Sincerely,

JACK SCAROLA  
JS/mep  
Enc.

cc: Bradley J. Edwards, Esq.



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).

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**EDWARDS' SUPPLEMENTAL RESPONSE TO REQUEST TO PRODUCE**

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned attorneys, files this supplemental response to the following request of Epstein:

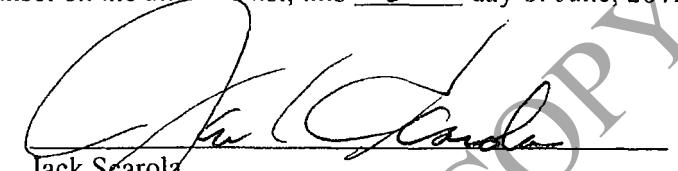
All emails, data, correspondence, and similar documents dated April 1, 2008 through August 1, 2010 by and between Bradley J. Edwards, Scott W. Rothstein, Marc Nurik, Cara Holmes, Mike Fisten, and any one of the following regarding or mentioning Jeffrey Epstein in any way; (a) the U.S. Attorney's Office, (b) the State Attorney's Office, (c) the Federal Bureau of Investigation, (d) Conchita Samoff, and (e) any other news employees or reporters.

Supplemental Response:

Except as previously delivered to Epstein's counsel or specifically identified on the previously delivered privilege log, no additional documents responsive to Epstein's request are in Bradley Edwards' possession, custody or control.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Edwards' Supplemental Response to Request to Produce

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by  
Electronic and U.S. Mail to all Counsel on the attached list, this 8<sup>th</sup> day of June, 2012.

  
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Attorney for Bradley J. Edwards

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
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