

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 7th day of August, 2012.



JACK SCAROLA

Florida Bar No.: 169440

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: (561) 383-9451

Attorneys for Defendant/Counterplaintiff, EDWARDS

COUNSEL LIST

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

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

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

Tonja Haddad Coleman, Esquire
524 S Andrews Avenue, Suite 200N
Fort Lauderdale, FL 33301
Phone: (954) 467-1223
Fax: (954) 337-3716

Lilly Ann Sanchez, Esquire
The L-S Law Firm
Attorney For: Jeffrey Epstein
1441 Brickell Avenue, 15th Floor
Miami, FL 33131
Phone: (305) 503-5503
Fax: (305) 503-6801

Docs

Responsive

to ORDER

NOT A CERTIFIED COPY

EDWARDS ADV. EPERSTEIN

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 Kuvn; 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 Kuvn; 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

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>
					privilege
...Emails03-04	6/2/2010 10:42 am	Conchita Sarnoff	Bradley Edwards; Spencer Kuvn; 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

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>
					privilege
...Emails07	6/8/2010 9:27am	Brad Edwards	Conchita Sarnoff	Location of 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
...Emails07	6/8/2010 8:55am	Conchita Sarnoff	Brad Edwards	Location of 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
...Emails07	6/8/2010 8:40am	Brad Edwards	Conchita Sarnoff	Location of 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
...Emails07	6/8/2010 8:26am	Conchita Sarnoff	Brad Edwards	Location of 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
...Emails08	6/8/2010 8:10am	Brad Edwards	Conchita Sarnoff	Location of 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
...Emails08	6/7/2010 21:57 am	Conchita Sarnoff	Brad Edwards	Location of Witnesses	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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privilege
...Emails08	6/7/2010 8:24am	Brad Edwards	Conchita Sarnoff	Location of 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
...Emails08	6/7/2010 20:06	Conchita Sarnoff	Brad Edwards	Location of 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
...Emails08-9	6/7/2010 7:57Pm	Brad Edwards	Conchita Sarnoff	Location of 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
...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 re: child 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
...Emails012	6/17/2010 11:37am	Brad Edwards	Conchita Sarnoff	Information re: child sex trafficking and 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

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>
					privilege
...Emails012	6/17/2010 11:19am	Conchita Sarnoff	Brad Edwards	Information re: child sex trafficking and 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 sex trafficking and 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 sex trafficking and 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 sex trafficking and 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

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>
					privilege
...Emails015	7/5/2010 14:08	Conchita Sarnoff	Brad Edwards	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
...Emails015-016	7/5/2010 2:03pm	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
...Emails016	7/5/2010 13:35	Conchita Sarnoff	Brad Edwards	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
...Emails016	7/5/2010 1:30pm	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
...Emails017	7/9/2010 3:16pm	Brad Edwards	Conchita Sarnoff	Conclusion of case.	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 of case.	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

<u>BATES</u>	<u>DATE</u>	<u>TO</u>	<u>FROM</u>	<u>DESCRIPTION</u>	<u>OBJECTION</u>
					privilege
...Emails017	7/9/2010 1:36pm	Brad Edwards	Conchita Sarnoff	Conclusion of case.	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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WEST PALM BEACH OFFICE:

2139 PALM BEACH LAKES BLVD.
WEST PALM BEACH, FLORIDA 33409

P.O. BOX 3626
WEST PALM BEACH, FLORIDA 33402

(561) 686-6300
1-800-780-8607
1-800-220-7006 Spanish

SEARCY
DENNEY
SCAROLA
BARNHART
& SHIPLEY P.A.

*Attorneys
at Law*

TALLAHASSEE OFFICE:

THE TOWLE HOUSE
517 NORTH CALHOUN STREET
TALLAHASSEE, FL 32301-1231

(850) 224-7600
1-888-549-7011

VIA EMAIL and U.S. MAIL

tonja@tonjahaddadpa.com

June 08, 2012

Tonja Haddad Coleman, Esquire
Law Offices of Tonja Haddad, P.A.
524 S Andrews Avenue, Suite 200N
Fort Lauderdale, FL 33301

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.

ATTORNEYS AT LAW:

ROSALYN SIA BAKER-BARNES
*F. GREGORY BARNHART
T. HARDEE BASS, III
LAURIE J. BRIGGS
BRIAN R. DENNEY
BRENDA S. FULMER
MARIANO GARCIA
JAMES W. GUSTAFSON, JR.
JACK P. HILL
DAVID K. KELLEY, JR.
CAMERON M. KENNEDY
WILLIAM B. KING²
DARRYL L. LEWIS¹
*WILLIAM A. NORTON
PATRICK E. QUINLAN³
EDWARD V. RICCI
*JOHN SCAROLA
*CHRISTIAN D. SEARCY
*JOHN A. SHIPLEY III
CHRISTOPHER K. SPEED⁸⁹
BRIAN P. SULLIVAN⁷⁴⁶
KAREN E. TERRY
DONALD J. WARD III
*C. CALVIN WARRINER III

OF COUNSEL

*EARL L. DENNEY, JR.³

SHAREHOLDERS

*BOARD CERTIFIED

ALSO ADMITTED

¹ KENTUCKY
² MAINE
³ MARYLAND
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PARALEGALS:

VIVIAN AYAN-TEJEDA
RANDY M. DUFRESNE
DAVID W. GILMORE
JOHN C. HOPKINS
DEBORAH M. KNAPP
VINCENT L. LEONARD, JR.
JAMES PETER LOVE
ROBERT W. PITCHER
MARK P. PONCY
KATHLEEN SIMON
STEVE M. SMITH
BONNIE S. STARK
WALTER A. STEIN

EXHIBIT C



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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(s),

vs.

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

Defendant(s).

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:

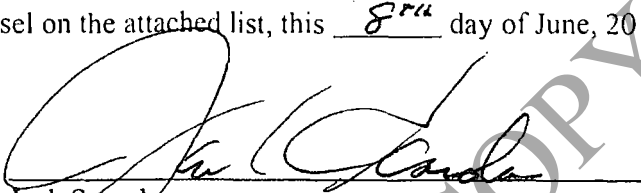
All emails, data, correspondence, and similar documents dated April 1, 2008 through August 1, 2010 by and between Bradley J. Edwards, Scott W. Rothstein, Marc Nurik, Cara Holmes, Mike Fisten, and any one of the following regarding or mentioning Jeffrey Epstein in any way; (a) the U.S. Attorney's Office, (b) the State Attorney's Office, (c) the Federal Bureau of Investigation, (d) Conchita Sarnoff, 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 8th day of June, 2012.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley, P.A.
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' Supplemental Response to Request to Produce

COUNSEL LIST

Bradley J. Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards, Fistos &
425 North Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954) 524-2820
Fax: (954) 524-2822

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

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

Tonja Haddad Coleman, Esquire
Law Offices of Tonja Haddad, P.A.
524 S Andrews Avenue, Suite 200N
Fort Lauderdale, FL 33301
Phone: (954) 467-1223
Fax: (954) 337-3716

Lilly Ann Sanchez, Esquire
The L-S Law Firm
1441 Brickell Avenue, 15th Floor
Miami, FL 33131
Phone: (305) 503-5503
Fax: (305) 503-6801