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1 BY MR. CRITTON:

2 Q. With regard to the, with regard to the
3 investigators, with regard to the investigation
4 bills that would come in from outside investigators,
5 specifically the one that you -- well, let me strike
6 that.

7 The investigator that you hired before you
8 went to RRA, I think you testified that bill was
9 paid by RRA, correct?

10 A. Yes.

11 Q. All right. And in terms of the
12 investigators who were employed by RRA for whatever
13 investigation you directed them to do, those
14 individuals were also paid from funds from RRA,
15 correct?

16 A. During the time period when I was at RRA
17 you're asking about specifically, correct?

18 Q. Correct.

19 A. Then the answer is, yes.

20 Q. Was there any specific cost account that
21 was set up for Mr. Epstein's cases?

22 A. I don't know.

23 Q. Did you ever speak with the --

24 A. Again we're talking about the time period at
25 RRA?

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1 Q. Okay. Well, if you could authorize any
2 expenditure that you wanted and nobody ever told you
3 not to, that you couldn't spend the particular
4 money, what controls, if any, existed with regard to
5 monies spent on the Epstein cases?

6 A. The presupposition that you just created is
7 incorrect, so I cannot answer that question. You began
8 with I have no limit to how I can spend money and that
9 there is no regulation. I mean, that's just not true,
10 so I don't understand what to tell you.

11 Q. What limits if any did you have in
12 spending money in prosecuting Mr. Epstein's case?

13 A. We went through expediting transcripts and I
14 used my own judgment.

15 Q. I understand that.

16 A. If we have another specific example, I will
17 address it and I will tell you whether I had that
18 authority or somebody else may have had that authority.
19 But specifically related to expediting transcripts and
20 things involving depositions, ordering depositions, I
21 used my judgment and it was never questioned.

22 Q. Separate and apart from transcripts, if,
23 if -- you've testified that the expenditures for
24 costs that the firm or the trustee is seeking back,
25 at RRA is seeking back, is seeking relating to any

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1 Q. At RRA

2 A. Okay.

3 Q. During the time you were at RRA did you
4 ever speak with the accounting department or the
5 accounting department ever call you to talk about
6 the amount of costs, assuming they were something
7 between 300 and \$500,000 that were being expended on
8 Mr. Epstein files?

9 A. No.

10 Q. Did, did anyone at the firm ever call you
11 to discuss the issue of the amount of costs between
12 300 and \$500,000 that were being incurred to
13 prosecute Mr. Epstein's cases?

14 A. No.

15 Q. Okay. Who had checked -- did you have any
16 check-signing authority at RRA?

17 A. No.

18 Q. Who did sign the checks?

19 A. I don't know. I was --

20 Q. In terms of the, the work that was being
21 done or the, the work that was, that is the costs
22 that were being incurred including reimbursable
23 costs, did you understand that you had a, basically
24 an unlimited budget to prosecute those cases?

25 A. No.

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1 recovery in any Epstein cases is between three and
2 \$500,000, correct?

3 A. Correct.

4 Q. All right. So, separate and apart from
5 expedited transcripts or video depositions or
6 serving subpoenas, that, there has to be, you know,
7 hundreds of thousands of dollars in additional
8 expenses that were associated with prosecuting
9 Mr. Epstein's cases, correct?

10 A. Correct.

11 Q. And with regard to those types of
12 expenditures that are in the hundreds of thousands
13 of dollars, who authorized those types of
14 expenditures?

15 A. I don't know.

16 Q. Well, you said that you used judgment
17 certainly with regard to transcripts. So, who, if,
18 if spending an extra two, three, \$400,000 separate
19 and apart from transcripts, serving subpoenas is not
20 a limitless budget, how would you describe it; that
21 is, what controls if any did you have in prosecuting
22 the Epstein cases?

23 A. First, I haven't seen the delineation of that
24 amount and I don't know that we agree with Rothstein
25 Rosenfeldt Adler as to their costs, but that is what

11 (Pages 188 to 191)

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1 they're claiming. I never juxtaposed that with what I
2 believe should be the proper amount. But beginning with
3 the fact that I do recognize that as the amount that
4 they are claiming, I was not aware that the costs were
5 that high.

6 The cases were firm cases, paid for by the
7 firm. I was simply an employee and I made judgment
8 calls. If somebody had told me at any given time,
9 we shouldn't serve these subpoenas, or we shouldn't
10 take this deposition, I wouldn't have done it.

11 Q. In fact, with regard to -- well, let me
12 ask you this: Were any informants, did you
13 authorize your investigators to hire informant,
14 informants?

15 MR. SCAROLA: Same objection, same
16 instruction.

17 BY MR. CRITTON:

18 Q. Did you authorize your investigators to do
19 electronic eve's dropping?

20 MR. SCAROLA: Same objection, same
21 instruction.

22 BY MR. CRITTON:

23 Q. You indicated that you were just an
24 employee, correct?

25 A. Yes.

1 Q. Okay. In fact, you, on various documents
2 reflected that you were a partner of the firm,
3 correct?

4 A. Yes, document, documents do reflect that
5 title, of course, yeah.

6 Q. And if I had asked for a card during the
7 time that you started at RRA up until the time of
8 the implosion of the firm in late October of '09,
9 would your card have also reflected that you were a
10 partner of the firm?

11 A. I think you did request a card. I think I
12 gave it to you and I believe that it did say partner on
13 it.

14 Q. And you would agree that at least up until
15 the time of the implosion of RRA you held yourself
16 out to the public, and including other lawyers, as
17 being a partner of RRA, true?

18 A. What do you mean by held myself out to the
19 public?

20 Q. You called yourself a partner. You didn't
21 say I'm an employee; I'm not a partner, correct?
22 You held yourself out to the public as being a
23 partner?

24 MR. SCAROLA: I'm going to object to the
25 form of the question to the extent that it

1 suggests that those terms are mutually
2 exclusive.

3 THE WITNESS: That was a part of my answer
4 is that, I don't know --

5 MR. CRITTON: I am shocked to hear that.

6 THE WITNESS: I don't know that being an
7 employee means that you can't also be a
8 partner. There are equity partners and
9 non-equity partners to nearly every single
10 large firm, so I was a non-equity partner
11 otherwise known as a salaried employee. That's
12 just the way it was.

13 BY MR. CRITTON:

14 Q. But your card just reflected partner as
15 did your --

16 A. Rather than that whole script I just told you.

17 Q. Right. Rather than the qualifying
18 provisions.

19 A. Yes, you're right. The qualifying positions
20 didn't make the card.

21 Q. With regard to the monies that was, that
22 were being paid by, by Rothstein, I'm sorry, by the
23 RRA firm for the costs -- let me strike that.
24 During the time that you were at the RRA firm, the
25 seven months that you were there from April through

1 the end of October, do you recall any significant
2 settlements that were coming into the firm; that is,
3 that were publicized?

4 A. Do I recall significant settlements --

5 Q. Correct.

6 A. -- coming into the firm that were publicized?

7 Q. Correct?

8 A. I believe, I can't say with any degree of
9 specificity whether I remember anything that falls into
10 all of those categories.

11 Q. Now, I forgot my question for a minute.
12 If I understand your answer, and assuming I remember
13 my question, Mr. Edwards, you don't recall any
14 significant settlements coming into the firm that
15 were, that were publicized either internally within
16 the firm or within the newspapers; is that a fair
17 statement?

18 A. Fair statement.

19 Q. Where did you think all of the money that
20 was coming from -- let me strike that. At that time
21 how many lawyers were there in the Fort Lauderdale
22 office; that is, during the time you were there?

23 A. I don't know.

24 Q. Best estimate?

25 A. Seventy.

1 Q. Okay. And the support, how many floors
2 did RRA occupy in the Fort Lauderdale --
3 A. I believe six.
4 Q. And approximately how many square feet on
5 each floor?
6 A. I don't know. A lot.
7 Q. More than 10,000 square feet on each
8 floor?
9 A. I don't know.
10 Q. And what was the support staff at the time
11 that you were there approximately?
12 A. In quantity or quality?
13 Q. Quantity, the number of people.
14 A. I don't know. A lot of people.
15 Q. Did you do any hourly billing yourself at
16 all or were you strictly a contingency fee person?
17 A. 90 percent contingency.
18 Q. And with regard to the monies that were --
19 separate and apart from the Epstein, Epstein cases
20 where at least you now know that they cost between
21 three and \$500,000, you were, I assume, incurring
22 other expenses on other cases, true?
23 A. True.
24 Q. All right. And where did you, where did
25 you think that the money was coming from; that is,

1 BY MR. CRITTON:
2 Q. Where did you think the law firm -- let me
3 strike that. Did you ever discuss with anyone
4 whether it was from current cash that was being used
5 or whether they had a line of credit or both?
6 A. Didn't know.
7 Q. Mr. Edwards, did you come to learn that
8 investigators had, that investigators had gone to
9 Mr. Epstein's property on March 17th, 2010?
10 A. No.
11 Q. Did you ever authorize any investigators
12 to enter Mr. property (sic), Mr. Epstein's property
13 on March 17th, 2010?
14 MR. SCAROLA: Objection. Instruct you not
15 to answer on the basis of work-product
16 privilege.
17 BY MR. CRITTON:
18 Q. Let me just be clear. Are, are you aware
19 of any investigators who entered Mr. Epstein's
20 property on March 17th, 2010?
21 MR. SCAROLA: Same objection as well as
22 attorney-client privilege and instruct you not
23 to answer.
24 BY MR. CRITTON:
25 Q. Mr. Edwards, did you authorize any

1 the source of the money to pay the extensive bills
2 that were being incurred on Epstein and other cases?
3 MR. SCAROLA: I am going to object to the
4 extent the question calls -- excuse me, I'm
5 going to object because there is no proper
6 predicate to the question, and that is that it
7 was a matter that was ever given a thought by
8 Mr. Edwards.
9 MR. CRITTON: Is that form? Form is
10 adequate so you don't have to instruct him.
11 MR. SCAROLA: Thank you.
12 THE WITNESS: What's the question?
13 BY MR. CRITTON:
14 Q. What did you consider, what did you
15 believe was the cost; that is, the source of the
16 money that was used to be paying these extensive
17 costs that were being incurred in Epstein and other
18 cases?
19 MR. SCAROLA: Objection.
20 MR. CRITTON: Just of yours and yours
21 alone?
22 MR. SCAROLA: Objection, form and
23 compound.
24 THE WITNESS: The law firm.
25

1 investigators to trespass on Mr. Epstein's property
2 on March 17th of 2010?
3 MR. SCAROLA: Same objection and
4 instruction.
5 BY MR. CRITTON:
6 Q. Mr. Edwards, did you authorize
7 investigators to hide in the bushes at Mr. Epstein's
8 house in order to take photographs of either
9 Mr. Epstein or any associated objects on his
10 property?
11 MR. SCAROLA: Same objection and
12 instruction.
13 BY MR. CRITTON:
14 Q. Mr. Epstein -- Mr. Epstein. Mr. Edwards,
15 do you know a lady name Christina Kitterman?
16 A. Yes.
17 Q. Okay. And who -- how do you know her?
18 A. She was a lawyer at Rothstein Rosenfeldt Adler
19 when I was a lawyer at Rothstein Rosenfeldt Adler.
20 Q. Did you have any dealings with her on any
21 of your cases?
22 A. None.
23 Q. What did you understand her area of
24 practice?
25 A. Never knew.

1 Q. Did you know an individual by the name of
2 Patrick Roberts?

3 A. Yes.

4 Q. Okay. And who is Mr. Roberts during that
5 is, what did Mr. Roberts do for RRA?

6 A. He was an investigator.

7 Q. Did he ever perform investigation work on
8 any of the Epstein files?

9 MR. SCAROLA: Same objection, same
10 instruction.

11 BY MR. CRITTON:

12 Q. Did you ever authorize Mr. Roberts to
13 perform investigation on the Epstein files?

14 MR. SCAROLA: Same objection and
15 instruction.

16 BY MR. CRITTON:

17 Q. All right. I asked you earlier about
18 Richard Fandrey, F-a-n-d-r-e-y. I think you said
19 you don't know who that -- you knew someone named
20 Rick; is that correct?

21 A. I know an investigator named Rick.

22 Q. Did Rick, did Rick perform any
23 investigation on the Epstein, did you authorize Rick
24 to perform any investigation on the Epstein files?

25 MR. SCAROLA: Same objection and

1 instruction.

2 MR. CRITTON: Says he doesn't know them.
3 How can that be an instruction?

4 MR. SCAROLA: Well, because I am not going
5 to tell you, we're not going to permit
6 Mr. Edwards to answer any questions about
7 either what he did or what he didn't do that
8 are part of the work product involved in his
9 representation of the Plaintiffs with claims
10 against Mr. Epstein whom Mr. Edwards is
11 representing.

12 MR. CRITTON: Did you ever --

13 MR. SCAROLA: So, in light of that and
14 what I have attempted to make very clear with
15 regard to the scope of our objections, if you
16 continue to ask questions which it is clear
17 fall within the scope of my instructions to
18 Mr. Edwards and my announced intention with
19 regard to the scope of those instructions, then
20 we will terminate this deposition so that I can
21 seek a protective order.

22 My suggestion is that you move onto other
23 areas that are outside the scope of that
24 instruction, if you have any other questions
25 outside the scope.

1 instruction.

2 BY MR. CRITTON:

3 Q. And I believe we talked a little bit
4 about, we certainly talked about Mr. Jenne, did you
5 ever authorize or direct Mr. Jenne to perform any
6 investigation on the Epstein files?

7 MR. SCAROLA: Same objection and
8 instruction.

9 BY MR. CRITTON:

10 Q. Are you familiar with the company called
11 Blue Line Research and Development?

12 A. No.

13 Q. Are you, are you aware at the current time
14 that there is an entity called Blue Line Research
15 and Development which is composed of Mr. Roberts,
16 Mr. Richard Fandrey, Mr. Michael Fisten and Ken
17 Jenne?

18 A. No.

19 Q. If you're unaware of the existence of the
20 entity called Blue Line Research and Development,
21 LLC, would it be a correct statement that you have
22 never authorized anyone from Blue Line Research and
23 Development, LLC, to conduct any investigation of
24 Jeffrey Epstein?

25 MR. SCAROLA: Same objection, same

1 MR. CRITTON: Oh, I have a lot of other
2 questions.

3 MR. SCAROLA: Okay.

4 MR. CRITTON: Let me be clear with you
5 with regard to any, for purposes of following,
6 asking any follow-up questions should the court
7 determine that I am entitled to this
8 information, you would agree that should the
9 court determine I am entitled to ask the name
10 of these individuals and possibly other
11 questions is, is that by not asking questions I
12 am in no way waiving my right to ask as many
13 questions as the court ultimately determines as
14 appropriate, proper, and as the court allows,
15 correct?

16 MR. SCAROLA: I absolutely agree.

17 MR. CRITTON: All right.

18 BY MR. CRITTON:

19 Q. Mr. Edwards, are you familiar with a
20 person named Alfredo Rodriguez?

21 A. Yes.

22 Q. And how do you know Mr. Rodriguez?

23 A. Who do I know him to be? How do I know him?
24 I met him the same -- well, I met him after you did,
25 after you and your investigators pre-deposed him on three

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1 various occasions for a total of about 15 hours before
 2 we took this deposition. I met him for the first time
 3 during that deposition.
 4 MR. CRITTON: Let me move to strike as
 5 nonresponsive.
 6 BY MR. CRITTON:
 7 Q. My question to you is when did you first
 8 meet Mr. Rodriguez?
 9 MR. SCAROLA: And you have an answer to
 10 that question.
 11 THE WITNESS: It's a very complete answer.
 12 I, the day of his deposition.
 13 BY MR. CRITTON:
 14 Q. Had you ever spoken with Mr. Rodriguez
 15 before that time?
 16 A. No.
 17 Q. Okay. Had anyone on your behalf spoken
 18 with Mr. Rodriguez?
 19 A. No.
 20 Q. Mr. Rodriguez's deposition occurred over a
 21 two-day period; is that correct? Two separate days.
 22 A. I believe that's right.
 23 Q. And you were present for both of those
 24 depositions; is that correct?
 25 A. Yes.

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1 Q. And the first one I believe at least in
 2 looking at the transcript the first one occurred on
 3 January 29th of '09?
 4 A. I'm assuming.
 5 Q. And the second, the follow-up was on
 6 August 7th, 2009, correct?
 7 A. When was the first, January you said?
 8 Q. Excuse me. I'm sorry. July 29th, 2009.
 9 A. Okay.
 10 Q. With the follow-up July, I'm sorry
 11 August 7th, 2009.
 12 A. If you say so. I'm not quarreling with that.
 13 Q. And I will just represent that is what I
 14 read off the transcripts. Between those two dates,
 15 that is July 29th and August 7th of '09, did you
 16 speak with Mr. Rodriguez at all?
 17 MR. SCAROLA: Same objection, same
 18 instruction to the extent that any such
 19 conversation may have occurred in connection
 20 with your representation of the Plaintiffs and
 21 claims against Mr. Epstein.
 22 BY MR. CRITTON:
 23 Q. All I am asking right now, not the
 24 substance but just so the record is clear I am just
 25 asking, did you speak with Mr. Rodriguez between

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1 July 29th and August 7th?
 2 A. And if I did or if I didn't, either way that's
 3 going to be protected by the work-product privilege and
 4 I'm not going to give you that information because
 5 you're not entitled to it.
 6 Q. I disagree even in a simple
 7 attorney-client privilege you also, you identify the
 8 date, you don't identify the subject, but you
 9 identify the date, who may have been present.
 10 MR. SCAROLA: We understand your position
 11 and it's not necessary to articulate it on the
 12 record.
 13 MR. CRITTON: I just want to be clear.
 14 And your position is the same is you're not
 15 talking.
 16 MR. SCAROLA: Work-product.
 17 MR. CRITTON: Work-product, correct?
 18 MR. SCAROLA: That's correct.
 19 BY MR. CRITTON:
 20 Q. Mr. Rodriguez was requested to bring
 21 documents to his second deposition that he had
 22 referenced that he might have. Do you recall that
 23 from the first deposition, Mr. Edwards?
 24 A. I do.
 25 Q. And in fact when he came to the second

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1 deposition, he didn't bring any documents with him,
 2 did he?
 3 A. I don't remember.
 4 Q. Well, do you remember him producing any
 5 documents at the second, at his completion of his
 6 deposition?
 7 A. I don't remember.
 8 Q. Do you recall him saying that he might
 9 have some sort of book or some sort of list of names
 10 and addresses and/or names, excuse me, of females
 11 who may have come to Mr. Epstein's house along with
 12 phone numbers?
 13 A. I don't remember if he said that or it says
 14 that in the police report, but I remember that
 15 information at some point in time.
 16 Q. All right. And subsequent, at the
 17 conclusion -- well, let me strike that.
 18 Do you recall receiving any documents from
 19 Mr. Rodriguez that were produced at his deposition
 20 that had the names and addresses and/or phone
 21 numbers of any other females?
 22 A. I don't know. Do you? We were there together
 23 I don't remember specifically. I think the answer is
 24 no.
 25 Q. And I think you're right.

15 (Pages 204 to 207)

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1 A. Okay.

2 Q. We agree on that.

3 A. Okay.

4 Q. Subsequent to the deposition; that is,
5 after Mr. Rodriguez's deposition, did Mr. Rodriguez
6 contact you?

7 MR. SCAROLA: Objection, instruct you not
8 to answer.

9 MR. CRITTON: Well, this is -- okay. This
10 is a third party contacting Mr. Edwards. All
11 right.

12 MR. SCAROLA: It is not --

13 MR. CRITTON: It's just a yes or no I'm
14 looking for.

15 MR. SCAROLA: It is a witness in these
16 proceedings.

17 MR. CRITTON: So.

18 MR. SCAROLA: So, anything that
19 Mr. Edwards has done or may have done in
20 connection with his investigation and
21 prosecution of the claims against Mr. Rothstein
22 it is our position is not the appropriate
23 subject matter of inquiry in the context of
24 this lawsuit, and is an attempt to invade the
25 attorney-client and work-product privileges. I

1 instruction.

2 BY MR. CRITTON:

3 Q. Did Mr. Mr. Rodriguez ever make a request
4 of you at any time for any type of monies for
5 testimony, documents, or any other information
6 associated with any existing or potential claimants
7 directed to Mr. Epstein?

8 MR. SCAROLA: Same objection and
9 instruction.

10 BY MR. CRITTON:

11 Q. Subsequent, after Mr. Rodriguez or from
12 the time that Mr. Rodriguez completed his deposition
13 on August 7th of 2009, did you have an occasion to
14 speak with either the FBI, well, with the FBI
15 regarding Alfredo Rodriguez?

16 MR. SCAROLA: Same objection and
17 instruction.

18 BY MR. CRITTON:

19 Q. Did you after Mr. Rodriguez's completion
20 of his deposition on August 7th, 2009, did you have
21 an occasion to speak with any representative, a
22 professional attorney, professional slash attorney
23 for the U.S. Attorney's Office?

24 MR. SCAROLA: Same objection and
25 instruction.

1 am instructing him not to answer.

2 If the court, if the court determines that
3 the scope of the privilege permits a response
4 to these questions, we would be happy to
5 respond to them.

6 But we have an obligation to, to
7 Mr. Edward's clients to protect their rights to
8 a fair trial and their rights to
9 confidentiality, and for that reason we are
10 obliged to interpret those privileges in their
11 broadest sense unless and until the court
12 decides that a more restrictive interpretation
13 should be applied.

14 BY MR. CRITTON:

15 Q. Between the first and second deposition of
16 Mr. Rodriguez, I think you, I think you indicated
17 that you did not speak with him; is that correct?

18 A. You're asking me if I indicated to you
19 previously during this deposition whether --

20 Q. Right.

21 A. -- I spoke to him or not? I, I don't
22 remember.

23 Q. Did you speak with Mr. Rodriguez between
24 his first and second.

25 MR. SCAROLA: Same objection, same

1 BY MR. CRITTON:

2 Q. Mr. Edwards, are you familiar with the,
3 the criminal complaint that was filed relating to
4 Alfredo Rodriguez?

5 MR. CRITTON: Let me show you what I will
6 mark as Exhibit 1 to the deposition.

7 (Plaintiff's Exhibit No. 1 was marked for
8 identification.)

9 MR. SCAROLA: By that question, does that
10 mean has he seen it before?

11 MR. CRITTON: First, let me show you
12 Exhibit 1. Do you -- it's a criminal
13 complaint, the United States of America versus
14 Alfredo Rodriguez.

15 MR. SCAROLA: Is your question has he seen
16 it before?

17 MR. CRITTON: Yes.

18 MR. SCAROLA: I'm not sure what "are you
19 familiar with it" means.

20 BY MR. CRITTON:

21 Q. Have you seen this criminal complaint
22 before today?

23 A. Yes.

24 Q. When did you first see this document?

25 A. I -- I don't know.

1 Q. Did you, did you see Exhibit 1, the
2 criminal complaint, prior to the time that it was
3 filed in the United States District Court?

4 A. Did I see it prior to it being filed?

5 Q. Yes, sir.

6 A. No, no.

7 Q. Okay. Did you provide an affidavit to any
8 individual at the FBI or the U.S. Attorney's Office
9 in support of, although not attached to this, to
10 Exhibit 1, the criminal complaint?

11 A. Repeat.

12 Q. Did you sign any affidavit or give, give
13 any sworn testimony associated with the criminal
14 complaint that was filed by the United States of
15 America versus Mr. Rodriguez?

16 A. It's obvious to me that you're trying to
17 circumvent the privileges that have been placed on the
18 record. I will answer that question that, no, I did
19 not, but I am not here to divulge anything that may
20 waive my attorney-client or work-product privilege or
21 otherwise jeopardize the claims that my three clients
22 are pursuing against Jeffrey Epstein for their being
23 sexually molested by him when they were underage minor
24 females.

25 Q. Mr. Edwards, are you the cooperating

1 witness who was referenced in the criminal
2 complaint, Exhibit 1?

3 MR. SCAROLA: Could you explain to us for
4 the record, please, how that line of inquiry is
5 reasonably calculated to lead to admissible
6 evidence in this case?

7 MR. CRITTON: I am not prepared to do that
8 right now.

9 MR. SCAROLA: Then I am not prepared to
10 allow Mr. Edwards to answer that question
11 outside the presence of an Assistant United
12 States Attorney who can make a judgment as to
13 whether that is information that ought to be
14 disclosed.

15 BY MR. CRITTON:

16 Q. Mr. Edwards, you knew or you first Marie
17 Villafana through the complaint you filed on behalf
18 of Jane Doe 1 and Jane Doe 2 in July of 2008,
19 correct?

20 A. No.

21 Q. Had you spoken with her before that period
22 of time; that is, before the complaint was ever
23 filed?

24 A. Yes.

25 Q. And I am now -- did you know Ms. Villafana

1 during your years that you had worked as a State
2 Attorney?

3 A. No.

4 Q. Okay. Did you meet her only as a result
5 of Epstein related matters?

6 A. Yes, in its broadest sense I suppose.

7 Q. Did you, did you have, before you began
8 representing E.W., did you know who Marie Villafana
9 was?

10 A. I don't know.

11 Q. What, what was your first association or
12 what contact was, what was your first contact with
13 Marie Villafana ever?

14 A. I don't remember.

15 Q. But if I understand correctly you only
16 know her through the context of the Jeffrey Epstein
17 matter; is that correct?

18 A. Her involvement with, yes.

19 Q. And that you only knew of her involvement
20 in the Jeffrey Epstein matter after you began
21 representing E.W.?

22 A. I don't believe that to be accurate.

23 Q. What involvement could you possibly, what
24 involvement would you have had with Mrs. Villafana
25 before you became involved in representing someone

1 associated with the Epstein matter?

2 A. I believe that I had read her name in the
3 newspaper related to some involvement with Jeffrey
4 Epstein's criminal investigation and/or case. I think
5 that's the first time I saw her name, I believe.

6 Q. Before, before you filed a lawsuit against
7 the United States of America, and I may have asked
8 you this earlier, so I apologize, did you ever speak
9 with Mrs. Villafana?

10 A. I believe that any communications that I would
11 have had with respect to Mrs. Villafana would have only
12 been in the interest of pursuing claims on behalf of the
13 clients that I represented. And therefore I am going to
14 claim a work-product privilege as to those
15 communications.

16 Q. Okay. My, my question was is only did you
17 speak with her prior to filing that complaint? Just
18 a yes or a no, and I am looking, that question is
19 not asking for the substance. I am just asking for
20 a yes or no.

21 MR. SCAROLA: Same objection, same
22 instruction.

23 BY MR. CRITTON:

24 Q. During the course of the litigation with
25 the United States Attorney's Office, I assume you

<p style="text-align: right;">Page 216</p> <p>1 had conversations with Mrs. Villafana from time to 2 time? 3 A. Okay. 4 Q. Is that true? 5 A. Is your assumption true? 6 Q. Correct. 7 A. I have spoken with Ms. Villafana. 8 Q. And when you spoke with Ms. Villafana -- 9 let me strike that. Have the only conversations 10 that you have had with Mr. Marie Villafana or 11 Villafana, have they only been in the context of 12 Jane Doe 1 and 2 versus United States of America, 13 only in the context of that case? 14 MR. SCAROLA: Same objection. 15 MR. CRITTON: And I will separate out to 16 the extent that you were at the June 12th, 17 2009, hearing in front of Judge Marra where she 18 was present. 19 MR. SCAROLA: Same objection, same 20 instruction. 21 BY MR. CRITTON: 22 Q. Has Ms.-- have you spoken, have you had an 23 occasion to speak with Ms. Villafana with regard to 24 the criminal complaint, Exhibit No. 1, involving 25 Alfredo Rodriguez, Mr. Rodriguez?</p>	<p style="text-align: right;">Page 218</p> <p>1 BY MR. CRITTON: 2 Q. Did you speak with Agent Nesbitt at that 3 time? 4 A. Yes. 5 Q. Okay. And what did, what did, did she 6 initiate the conversation or did you? 7 A. The court initiated the conversation. 8 Q. Did the court say go outside and talk? 9 A. Right. 10 Q. The court being Judge Marra? 11 A. Correct. 12 Q. And who else was present for that 13 conversation? 14 A. I don't remember. Marie Villafana. 15 Q. Okay. What was the discussion about that 16 the court ordered? 17 A. The failure of the U.S. Attorney's Office to 18 meaningfully confer with the numerous victims of Jeffrey 19 Epstein's sexual abuse prior to negotiating a plea in 20 his criminal matter. 21 Q. How long did the conversation last? 22 A. Less than ten minutes. 23 Q. Was Agent Jason Richards there as well? 24 A. There was a male agent there. I don't know 25 his name, but there was another FBI agent.</p>
<p style="text-align: right;">Page 217</p> <p>1 MR. SCAROLA: Same objection, same 2 instruction. 3 BY MR. CRITTON: 4 Q. Mr. Edwards, have you ever been 5 interviewed by the FBI or the U.S. Attorney's office 6 with regard to any of your clients? 7 MR. SCAROLA: Any of the three clients who 8 have claims against Mr. Epstein? 9 MR. CRITTON: Correct. 10 MR. SCAROLA: Same objection, same 11 instruction. 12 BY MR. CRITTON: 13 Q. Do you know Agent Nesbitt, sir? 14 A. Yes. 15 Q. And how do you know Agent Nesbitt from the 16 FBI? 17 A. I can answer if you want. 18 MR. SCAROLA: Okay. That's fine. 19 MR. CRITTON: Nesbitt Kirkendahl. 20 THE WITNESS: I don't know her last name 21 but I do know the first name is, the first name 22 is obviously an unusual name, so I do know who 23 that is. I met her outside of the courtroom 24 related to the Jane Doe 1 and 2 versus United 25 States of America case.</p>	<p style="text-align: right;">Page 219</p> <p>1 Q. Did Agent Nesbitt Kirkendahl, did she say 2 anything? Did she participate in the conversation? 3 A. No. 4 Q. Okay. Was it just Mrs. Villafana? 5 A. There was another U.S. Attorney there. 6 Q. A U.S.A.O. there? 7 A. Yes. 8 Q. Do you remember a he or a she? 9 A. He. 10 Q. Do you remember his name? 11 A. Lee. 12 Q. Lee? 13 A. I think that's his last name. Dexter Lee. 14 Q. Did Mr. -- did Dexter Lee, is he the one 15 who conducted the conversation with you? 16 A. Yes. 17 Q. What was his response to your statement? 18 A. That this conversation is more complicated 19 than the time constraints that we have right now will 20 allow. We are not going to come to a resolution at this 21 point on any issues that you or your clients believe are 22 pertinent to the case you filed. 23 Q. That was the end of the conversation? 24 A. I mean, I am not quoting verbatim, but, yes 25 that was the summary.</p>

18 (Pages 216 to 219)

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1 Q. And did you go back in front of Judge
2 Marra that same day?

3 A. I can't remember.

4 Q. Did he issue an order based upon that
5 hearing?

6 A. The, the record in the case will speak for
7 itself. I really, I don't remember right now.

8 Q. Have you had any other conversations with
9 Nesbitt Kirkendahl other than? Well, I mean any
10 other face-to-face conversations with her other than
11 that one day back in July of, July or August of
12 2008?

13 A. No.

14 Q. Have you seen Nesbitt, Agent Nesbitt
15 Kirkendahl since July, July or August of 2008 during
16 that short conference as physically seen her
17 someplace?

18 A. Unless she was at the hearing we all attended
19 on your motion to stay that day when there were a lot of
20 people in the courtroom, the answer is no.

21 Q. Okay. Have you seen Agent Jason, assuming
22 the male agent's name was Jason Richards or Richard,
23 have you seen him since that day in July or August
24 of 2008?

25 A. I do not believe I have.

1 Rothstein.

2 Q. So, it would be a correct, and I am going
3 to expand it, would it be a correct statement that
4 no representative of the federal government and by
5 that I mean the Department of Justice, FBI, any
6 other law enforcement agency nor any state
7 governmental agency has ever asked you or quizzed
8 you or questioned you about your association with
9 Rothstein, Rosenfeldt, and Adler during the seven,
10 approximately seven months you were there; is that
11 correct?

12 A. That's correct.

13 Q. Mr. Edwards, has, has anyone from the
14 United States Attorney's Office discussed the
15 topic -- well, let me strike that. Have you been
16 granted immunity with regard to any aspect of your
17 work associated with either the Epstein files or the
18 Rothstein prosecution?

19 A. I don't understand your question.

20 Q. Okay. You're aware that Mr. --

21 A. I can answer, no. I haven't been granted
22 immunity to anything, so it doesn't matter what your
23 question is.

24 Q. Okay. Have you ever had any conversations
25 with any of the probation officers in Palm Beach

1 Q. Have you spoken with either Nesbitt
2 Kirkendahl or Jason Richard relating to any Epstein
3 related matter since July or August of 2008?

4 MR. SCAROLA: I am going to instruct you
5 not to answer on the basis of the privilege as
6 previously described.

7 BY MR. CRITTON:

8 Q. Mr. Edwards, have you spoken with any rep,
9 has any representative of the FBI attempted to speak
10 with you regarding your association with the RRA
11 firm?

12 A. No.

13 Q. Has any member of the U.S. Attorney's
14 Office discussed with you any aspect of your tenure
15 or employment at the RRA firm?

16 A. No.

17 Q. In any conversations that you, that you
18 had that you've had with the United States
19 Attorney's Office at any time, has anyone ever asked
20 you any questions about Scott Rothstein?

21 A. You're presupposing that I had conversations,
22 but I will answer the question whether I have or have
23 not had conversations. Nobody has asked me any
24 questions from the State Attorney's Office, U.S.
25 Attorney Office, FBI, or other agency related to Scott

1 County regarding Mr. Epstein?

2 A. No.

3 Q. Have you directed that anyone have any
4 discussions with the probation officers in Palm
5 Beach County regarding Mr. Epstein?

6 A. That is clearly calling for work-product
7 privilege information. I'm not going to answer the
8 question.

9 Q. Have you had any discussion with any of
10 the other lawyers who represent clients in the
11 Epstein, in Epstein related matters regarding
12 Mr. Epstein's probation?

13 MR. SCAROLA: Same objection, same
14 instructions, and I would add to those
15 objections the objection based upon a joint
16 prosecution interest.

17 BY MR. CRITTON:

18 Q. Mr. Edwards, among the Plaintiffs'
19 lawyers, is there any type of joint prosecution
20 agreement related to Mr. Epstein?

21 MR. SCAROLA: Same objection, same
22 instruction.

23 BY MR. CRITTON:

24 Q. Did you have -- did you engage in weekly
25 or monthly meetings among the Plaintiffs' lawyer to

1 share investigative material regarding, that you had
2 obtained regarding Mr. Epstein?

3 MR. SCAROLA: Same objections and
4 instructions.

5 BY MR. CRITTON:

6 Q. Did you provide any of the investigative
7 materials that had been acquired by you to any other
8 person outside of the RRA firm and the Farmer, Jaffe
9 firm up through the current date?

10 MR. SCAROLA: Would you read that question
11 back?

12 BY MR. CRITTON:

13 Q. Let me ask it. During the time that you
14 were with RRA, excuse me, and had investigation done
15 on Mr. Epstein, was any of your investigation that
16 you had performed turned over to any person outside
17 of RRA or your clients?

18 MR. SCAROLA: Same objection, same
19 instruction to the extent that that would
20 encompass other attorneys with a shared
21 interest in the prosecution of Mr. Epstein.

22 If any of those materials were turned over
23 to persons who did not have a direct interest
24 to lawyers who did not have a direct interest
25 in the prosecution of the claims against

1 instruction.

2 BY MR. CRITTON:

3 Q. Mr. Edwards, do any of the
4 investigators — let me strike that. Did any of the
5 investigators who worked for RRA refer any Epstein
6 client to you?

7 A. What is an Epstein client?

8 Q. I am sorry. Did any of the investigators
9 who worked for RRA refer a perspective claimant
10 against Mr. Epstein to you?

11 A. No.

12 Q. Did any of your, did any of the RRA
13 investigators ever meet with your three clients?

14 MR. SCAROLA: Same objection. Same
15 instruction.

16 MR. CRITTON: Okay. And I'm looking for
17 is a yes/no.

18 MR. SCAROLA: Correct. Same objection,
19 same instruction.

20 BY MR. CRITTON:

21 Q. Mr. Edwards, during the time that you were
22 with RRA, did you, your e-mail, was your only e-mail
23 address bedwards@rra-law.com?

24 A. I only had one e-mail address.

25 Q. All right. Did you ever receive any

1 Mr. Epstein or to clients who did not have, to
2 persons who did not have a direct interest in
3 the pursuit of their claims against
4 Mr. Epstein, then you can answer to that
5 extent.

6 THE WITNESS: Privileged.

7 BY MR. CRITTON:

8 Q. And I just want to be clear is, is there
9 any written agreement and I know you, I want to make
10 certain that the objection is there, is as we both
11 know there are a number of claims. There are a
12 number of claims that are outstanding against
13 Mr. Epstein brought by a number of different
14 lawyers.

15 MR. SCAROLA: The objection extends to
16 both written agreements and oral agreements.

17 THE WITNESS: Yes. We both know that
18 there are a lot of claims against Mr. Epstein
19 for basically the same conduct.

20 BY MR. CRITTON:

21 Q. And my question to you is is, is there any
22 written agreement between the Plaintiff lawyers who
23 have filed claims against Mr. Epstein regarding the
24 sharing of information?

25 MR. SCAROLA: Same objection, same

1 information regarding your cases at your home
2 e-mail?

3 A. I don't remember.

4 Q. Okay. What is your home e-mail address,
5 please.

6 THE WITNESS: Do I give this?

7 MR. SCAROLA: (Mr. Scarola nods his head.)

8 THE WITNESS: B-r-a-d-d-6-9@hotmail.com.

9 BY MR. CRITTON:

10 Q. Did you have a separate fax number at RRA
11 when you were there; that is, just so a fax would
12 come directly to either yours or an area where you
13 were located?

14 A. No.

15 Q. In any of the directions that you ever
16 gave to the investigators, did you ever put that in
17 the form of a memo; that is, would you give them
18 written directions?

19 MR. SCAROLA: Same objection, same
20 instruction.

21 BY MR. CRITTON:

22 Q. To your knowledge did any of the
23 investigations that were done regarding Mr. Epstein,
24 were they provided to any other person at RRA?

25 A. Excuse me?

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<p>1 Q. You have testified that investigations 2 were done during the time, on Mr., relating to 3 Mr. Epstein during the time that you were at RRA 4 A. Right. 5 Q. My question to you is, did you -- first of 6 all did you receive written reports in addition to 7 oral reports? 8 A. From the investigators? 9 Q. Yes, sir. 10 THE WITNESS: Answer? 11 MR. SCAROLA: Yeah. 12 THE WITNESS: The reports were -- yes, I 13 did. 14 BY MR. CRITTON: 15 Q. And were the reports provided by e-mail or 16 were they provided by, in the form of a memo that 17 would be sent from the investigator to you or both? 18 A. I, I do not remember there being any in the 19 form of an e-mail. Does not mean that there was not. I 20 did communicate by e-mail with other members of the firm 21 and other members of the investigative team on all cases 22 as has been my practice all along practicing law. There 23 were memos, though, that were given to me that were not 24 e-mail form that were the standard memos that I would 25 incorporate into a witness memo file.</p>	<p>1 and I'm using just as an example, is that he came in 2 or Scott Rothstein came in and looked at a 3 particular file of yours, whether it related to 4 Mr. Epstein or not, you don't know? 5 A. I can't answer that question accurately. 6 Q. Okay. Did you ever send investigative 7 reports to other lawyers regarding Mr. Epstein; that 8 is, if you got an investigative report from 9 Mr. Fisten or Mr. Jenne or whomever, would you send 10 those on to certain lawyers on a regular basis? 11 MR. SCAROLA: You can answer that 12 question. 13 THE WITNESS: No. 14 BY MR. CRITTON: 15 Q. What lawyers, other than yourself, were 16 involved in the Epstein cases during the time you 17 were associated with RRA? 18 A. What do you mean by "were involved?" I guess 19 all. 20 Q. What, what lawyers actually worked on the 21 file? I know Mr. Berger worked on the Epstein 22 cases, correct? 23 A. In some limited capacity, correct. 24 Q. Okay. Mr. Adler I know attended 25 Mr. Epstein's deposition, correct?</p>
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<p>1 Q. And again that would just be in your, 2 would that be in your electronic storage as well as 3 in the hard copies? 4 A. The version I saw was the electronic. 5 Q. So, that would be stored in the Fortis 6 program? 7 A. That's correct. 8 Q. All right. And again other individuals in 9 the firm, other lawyers in the firm might be able to 10 access that program, you just don't know? 11 A. Right. Well, the program, obviously that's 12 the program that the firm used. Now, whether they could 13 access, if you could go across cases that weren't cases 14 you worked on, I really just don't know. 15 Q. As an example could Mr. Fisten, on the, on 16 the Fortis, could he access your, your file on an 17 Epstein case? 18 A. I don't know. 19 Q. If someone accessed your file, accessed 20 your electronic file, would you necessarily know 21 that? 22 A. No. 23 Q. All right. So -- 24 A. I don't believe so. 25 Q. It wouldn't show up that Michael Fisten,</p>	<p>1 A. Correct. 2 Q. Did, did any other lawyers other than 3 Mr. Adler or Mr. Berger attend any depositions? 4 A. Your memory is going to be as good as mine 5 there. I'm thinking. Mark Epstein's deposition was 6 attend by Russell Adler. 7 Q. He went with you to New York? 8 A. No. He didn't go with me to New York. He 9 attended the deposition, and I also attended the 10 deposition. 11 Q. Both in person? 12 A. Right. 13 Q. Was he there for another file or did he 14 meet you there to specifically attend Mark Epstein's 15 deposition? 16 A. Coincidence that he was in New York during the 17 time when his deposition was being taken. 18 Q. Any other lawyer that you can recall being 19 at a deposition other than Adler, Berger and 20 yourself? 21 A. Not right now. If you remind me, I, I may 22 remember. I don't remember right now. 23 Q. Did other lawyers in the firm at RRA 24 perform services on the files; that is, and by that 25 I mean did they, were they involved in drafting</p>

21 (Pages 228 to 231)

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1 motions, research, appeals, pleadings, papers that
2 were filed?

3 MR. SCAROLA: You can, you can answer
4 whether they were, there were other lawyers
5 involved in drafting tasks without identifying
6 what those may have been.

7 THE WITNESS: Other lawyers contributed to
8 some extent to the prosecution of those cases.

9 BY MR. CRITTON:

10 Q. Who? Names. I'm not asking for tasks.

11 MR. SCAROLA: You can answer.

12 MR. CRITTON: I am asking for names.

13 THE WITNESS: Bill Berger, Judge Stone,
14 Russell Adler, Rob Buschel.

15 BY MR. CRITTON:

16 Q. B-o-u-c-h-e-l?

17 A. I don't know how to spell it. B-u, I don't
18 know how, B-u-s-c-h-e-l, I believe.

19 Q. All right. Is he currently with you now?

20 A. No.

21 Q. Any other lawyers?

22 A. And you're asking for no matter how minimal,
23 just anything done by any lawyers?

24 Q. Correct.

25 A. Michael, I think his name is Michael. It was

1 Epstein case?

2 A. When I was giving you that list of names, I
3 was picturing one of the couple meetings related to
4 Jeffrey Epstein's case. Could there have been other
5 lawyers in the room, yes, but I think that is the
6 exclusive list.

7 Q. Did Mr., did anyone ever attend by phone
8 meetings associated --

9 A. I understand.

10 Q. -- that involved Mr. Epstein?

11 A. I understand. No.

12 Q. Did Scott Rothstein ever attend any
13 meetings wherein strategy was discussed regarding
14 the Epstein cases?

15 A. No.

16 Q. The one meeting that you had in Mr.,
17 Mr. Rothstein's office with Russell Adler and some
18 unknown person on the phone, were you given any
19 direction at that time that certain discovery should
20 be done or certain tactics should be used with
21 regard to prosecuting the Epstein cases?

22 MR. SCAROLA: Same objection, same
23 instructions.

24 BY MR. CRITTON:

25 Q. Did you ever receive any e-mail

1 another lawyer. That's, that's -- those are the ones
2 that I can remember right now.

3 Q. Were there ever meetings that occurred,
4 well, not -- were there ever specific meetings that
5 were attended by various lawyers to discuss
6 Epstein's cases?

7 MR. SCAROLA: You can answer whether there
8 were meetings.

9 THE WITNESS: There were meetings to
10 discuss every case including Jeffrey Epstein's
11 cases.

12 BY MR. CRITTON:

13 Q. And when you say there were meetings to
14 discuss every case, were there routine meetings that
15 were held to discuss your cases or cases in general?

16 A. It's how the firm worked. If you wanted to
17 discuss cases, or the case was a case that was thought
18 to need more than one or more than two attorneys, then a
19 meeting could easily be assembled within RRA to sit
20 around the table and discuss issues related to any case.
21 And yes, that happened with respect to cases filed
22 against Jeffrey Epstein.

23 Q. And so there could have been additional
24 lawyers in addition to Adler, Stone, Berger, and Rob
25 Buschel and yourself that would have commented on an

1 correspondence from Scott Rothstein that detailed or
2 that set forth discovery that would be, that should
3 be undertaken with regard to the Epstein cases?

4 MR. SCAROLA: You can answer that with a
5 yes or no.

6 THE WITNESS: No.

7 BY MR. CRITTON:

8 Q. Did you ever have, did you ever receive
9 any correspondence directly, Mr., Mr. Rothstein to
10 you, during the time that you were at RRA?

11 A. Yes.

12 Q. Did any of the correspondence ever involve
13 Epstein or communication ever involve Epstein?

14 MR. SCAROLA: You can answer that.

15 THE WITNESS: To some extent, yes.

16 BY MR. CRITTON:

17 Q. Okay. And what did, what did, what
18 information did Mr. Rothstein send you that involved
19 Mr. Epstein?

20 MR. SCAROLA: Same objection, same
21 instruction.

22 BY MR. CRITTON:

23 Q. Is the information that you received or
24 the communication you received from Mr. Rothstein
25 regarding, that involved Mr. Epstein, was that by

1 way of e-mail?

2 A. Yes.

3 Q. Did you ever receive any memorandum from
4 him; that is, a typewritten memo that was then sent
5 to you through office mail that was not electronic
6 involving Mr. Epstein?

7 A. No.

8 Q. At the meetings that you, at the meetings
9 that occurred where these various lawyers, Berger,
10 Adler, Stone, Rob Buschel were present and Epstein
11 was discussed, was the discovery that, discovery
12 and/or investigation regarding Mr. Epstein was that
13 ever discussed?

14 MR. SCAROLA: Same objection, same
15 instruction.

16 BY MR. CRITTON:

17 Q. Mr. Edwards, are you aware as a former
18 state prosecutor that there are laws against
19 conducting certain financial transactions in money
20 that's derived from a crime?

21 A. I don't understand your question.

22 Q. Okay. Well, you were a former state
23 prosecutor; is that correct?

24 A. Right. Yes.

25 Q. Right. Are you aware that there are

1 RICO claims.

2 Q. But you certain have brought RICO claims
3 against Mr. Epstein?

4 A. I know about one now.

5 Q. Okay. At the time that you were at the
6 State Attorney's Office, what kind of -- how long
7 were you there?

8 A. Three years.

9 Q. And what kind of crimes did you prosecute?

10 A. Beginning with DUI's through attempted murders
11 and everything in between. No -- well, not no, very few
12 economic crimes, some insurance fraud cases but very
13 few, otherwise drugs, guns, robberies, burglaries
14 attempted murder, aggravated batteries, those types of
15 crimes, false imprisonment.

16 Q. Well, were you ever, do you know what
17 money laundering means in a criminal context?

18 A. In some basic sense I do know what money
19 laundering means.

20 Q. What do you understand that to be?

21 A. That you, that the criminal takes money and
22 through some illegal means attempts to make bad money
23 legitimate.

24 MR. CRITTON: Let me show you what I will
25 mark as Exhibit 2 which is the complaint that

1 certain laws both state and federal that, that are,
2 that preclude conducting certain financial
3 transaction, transactions in money that is derived
4 from a crime?

5 A. Still don't understand your question. But
6 first before I try to answer your question, are you
7 taking me back to a time when I was a State Attorney and
8 asking back then did I know and then your question?

9 Q. Yes.

10 A. Back when I was a State Attorney did I know
11 that there are crimes related to money transactions?

12 Q. No.

13 MR. SCAROLA: Could I help you? Do you
14 want to ask him whether he was aware of the
15 existence of a state RICO statute?

16 MR. CRITTON: No.

17 MR. SCAROLA: Okay.

18 MR. CRITTON: I am okay with that first,
19 but I am still going to ask my question.

20 BY MR. CRITTON:

21 Q. I assume you're aware of the existence of
22 a state RICO statute, correct?

23 A. I don't know that I was aware of that back
24 then. I just can't remember whether I knew about RICO
25 back at the State Attorney's Office. I never prosecuted

1 was filed against Mr. Rothstein, yourself, and
2 L.M.

3 (Plaintiff's Exhibit No. 2 was marked for
4 identification.)

5 BY MR. CRITTON:

6 Q. You're familiar with this complaint, sir?

7 A. Unfortunately I have read this frivolous
8 complaint.

9 MR. CRITTON: Move to strike as
10 nonresponsive. You've seen -- all I want is a
11 yes or no.

12 Are you familiar with this document?

13 MR. SCAROLA: I am going to object to the
14 form of the question. It is vague and
15 ambiguous. I don't know what familiarity
16 means. He has seen it before.

17 BY MR. CRITTON:

18 Q. Mr. Edwards, you have seen and read the
19 entire complaint along with the attachments,
20 Exhibit 2?

21 A. I've read the complaint. I have never read in
22 the entirety Exhibit 2.

23 Q. Are you familiar, do you know what an
24 information is?

25 A. Yes.

1 Q. And that's Exhibit 1 attached to the
2 complaint, correct?

3 A. Correct.

4 Q. And you're aware that, and this is the
5 information that was brought by the United States of
6 America, U.S.A. versus Scott Rothstein, correct?

7 A. Yes.

8 Q. And you're aware that within the -- well
9 let me strike that. Are you aware that
10 Mr. Rothstein has pled guilty to, excuse me, the
11 information that was brought against him by the
12 U.S.A.?

13 A. I am aware that he pled guilty to something.

14 Q. With regard to the complaint brought by
15 the U.S.A., I am sorry, the information brought by
16 U.S.A. against Mr. Rothstein, I assume you have read
17 the allegations associated with the racketeering
18 conspiracy, the pattern of racketeering activity,
19 correct?

20 A. I haven't.

21 Q. Okay. If you turn to Page 3, Paragraph 4,
22 were you aware, were you aware prior to coming in
23 here today that Mr. Rothstein was, that the charges
24 that were brought against him were for under, under
25 RICO but with regard to mail fraud, wire fraud,

1 asserted that the firm was a racketeering
2 enterprise, correct?

3 A. Not necessarily -- no.

4 Q. Well, if you look in Paragraph 2, see
5 where the firm is identified as the enterprise of
6 the racketeering conspiracy?

7 A. Law firm. Paragraph 2 of the information says
8 Rothstein Rosenfeldt Adler, P.A., was a law firm with
9 offices located at 401 East Las Olas Boulevard, Fort
10 Lauderdale, Florida, and elsewhere. The law firm
11 employed approximately 70 attorneys and engaged in the
12 practice of law involving a wide range of specialties
13 including labor and employment law.

14 Q. Are you in Paragraph 2?

15 A. Of the information, yes.

16 Q. I'm sorry. I am looking at -- my
17 apologies. On Paragraph 2 under Count I, my error.

18 A. Okay.

19 Q. See where the law firm is identified as
20 the racketeering enterprise?

21 A. I'm sorry. Your question is am I, do I
22 recognize that the law firm is categorized as an
23 enterprise. Yes, in that paragraph I see that.

24 Q. Have you had an occasion to discuss with
25 any, with either Mr. Adler or Mr. Rosenfeldt any of

1 laundering of monetary instruments, engaging in
2 monetary transactions, and conspiracy to launder
3 monetary instruments and engage in monetary
4 transactions?

5 A. I, I have read that in the newspapers. I have
6 been told that by numerous people. So, yes, I was aware
7 of that.

8 Q. And within the complaint at Paragraph 6 it
9 says the Defendant --

10 A. The information or the complaint?

11 Q. I'm sorry. Within the information,
12 Exhibit 1 to the complaint, in Paragraph 6 where it
13 speaks in terms of the Defendant and his
14 co-conspirators, conspirators agreed, agreed to
15 engage in a pattern of racketeering activity through
16 its base of operation at the offices of RRA. Do you
17 see that?

18 A. Yes.

19 Q. Okay. Do you know who the, do you know
20 any of the co-conspirators in addition who are
21 associated with Mr. Rothstein?

22 A. Assuming that they are former employees of
23 RRA, which I would presume several of them are, I am
24 sure that I probably know them.

25 Q. And you're aware that the government has

1 the allegations directed to Mr. Rothstein --

2 A. No.

3 Q. -- in the criminal complaint?

4 A. No.

5 Q. Since the implosion at the firm have you
6 had an occasion to talk about or speak or discuss
7 any firm business regarding Mr. Rothstein and the
8 ponzi scheme that he was running at RRA?

9 A. Have I had an occasion where I could have
10 talked --

11 Q. No, I'm sorry. Have you had an occasion
12 to discuss with Mr. Adler since you left the firm or
13 since the implosion any aspects of the, of the ponzi
14 scheme that Mr. Rothstein and his co-conspirators
15 were running through the firm?

16 MR. SCAROLA: Are you asking whether he
17 did have such a discussion or whether he had an
18 occasion to have such a discussion?

19 BY MR. CRITTON:

20 Q. Did you have such a discussion?

21 A. No.

22 Q. Okay. Have you discussed that or have you
23 seen Mr. Adler at all other than hi, hello, since --

24 A. Yes. So, the occasion existed. We just
25 didn't have that discussion.

1 Q. Have you, and if I understand correctly
2 you haven't discussed any firm business with
3 Mr. Adler since the implosion; is that correct?
4 A. Firm business?
5 Q. Any firm RRA business?
6 A. Right, no.
7 Q. How about with Mr. Rosenfeldt, have you
8 had any discussions with him --
9 A. None.
10 Q. -- since the implosion of the firm in late
11 October of '09?
12 A. No.
13 Q. If you wanted, if you had any, other than
14 your existing partners have you had an occasion to
15 speak with any other partners or former partners of
16 the firm regarding the implosion -- well, let me
17 strike that -- regarding the ponzi scheme that was
18 being run by Mr. Rothstein through the firm?
19 A. I have spoken to my current partners about it.
20 Q. Are your current partners, are you aware
21 of any of your current partners being a target of an
22 investigation as a potential co-conspirator with
23 Mr. Rothstein?
24 A. No, way.
25 Q. You're not aware of or no one has told you

1 THE VIDEOGRAPHER: We are now off video
2 record --
3 MR. SCAROLA: That will be a refreshing
4 change.
5 THE VIDEOGRAPHER: We are now off video
6 record at 3:44 p.m.
7 (A brief recess was held.).
8 MR. CRITTON: Mr. Edwards --
9 THE VIDEOGRAPHER: We're back on video
10 record. It is 3:59 p.m.
11 BY MR. CRITTON:
12 Q. Mr. Edwards, when you joined RRA, if I
13 understood your earlier testimony, with regard to
14 the Epstein cases and your other cases when you came
15 there as far as you were concerned is you had the
16 ability to spend whatever money was necessary to
17 prosecute the Epstein cases, fair statement?
18 A. I don't know that that's true or it's not true
19 I mean.
20 Q. Well --
21 A. My judgment was never questioned.
22 Q. Correct. And therefore whatever monies
23 you spent either in investigation, in doing
24 discovery, that was your decision and your decision
25 alone, true?

1 that, correct?
2 A. I am not aware of that and nobody has told me
3 that.
4 Q. Mr. Rothstein founded what was, what
5 ultimately became RRA in approximately 2002. Were
6 you aware of that fact?
7 A. No.
8 Q. How long did you think Mr. Rothstein had
9 been -- well, let me strike that. How long did you
10 think RRA had been in existence prior to your
11 joining the firm? What were you told?
12 A. I don't know what I was ever told. I think
13 that I learned that information when the implosion, as
14 you call it, occurred.
15 Q. And were you, in terms of what the
16 revenues of the firm were, were you ever advised
17 what the revenues of the firm were?
18 A. No.
19 Q. Okay. Were you, were you familiar with
20 what the expenses were associated with operating the
21 RRA firm?
22 A. No.
23 Q. Were you in anyway -- well, let me strike
24 that. With regard to -- let me take a five minute
25 break and let me collect my thoughts.

1 A. Whatever money that I spent was my decision --
2 Q. No. Whatever money you spent on
3 investigators, on doing depositions, on requesting
4 transcripts, on doing what was necessary to
5 prosecute the Epstein cases, that was your decision?
6 A. No. The actions were my decisions in terms of
7 how to prosecute the case. The amount of money to spend
8 per exercise was not my decision nor was I privy to that
9 information.
10 Q. Well, but, you were the one who directed
11 that the particular task be taken, correct?
12 MR. SCAROLA: This is, this is
13 repetitious.
14 MR. CRITTON: I am setting a stage.
15 MR. SCAROLA: This is repetitious of areas
16 of examination that were covered thoroughly in
17 the earlier portions of this deposition.
18 THE WITNESS: If I wanted a witness
19 interviewed, I could ask an investigator to
20 interview. The investigator, how they were
21 paid, how much they were paid, whether they
22 were paid is not something that I had any
23 knowledge of at all.
24 BY MR. CRITTON:
25 Q. Okay. When you ran your own firm you

25 (Pages 244 to 247)

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1 obviously knew what, whether hiring an investigator
2 or what a particular cost was because you had to pay
3 it, correct?

4 A. Yes.

5 Q. Okay. And I think as you described
6 earlier is that there had been very little discovery
7 up until the time you started working for RRA in
8 your three cases, true?

9 A. Not very little discovery. Obviously we had
10 gone through interrogatories, responses, request for
11 production, responses or lack of responses, however, the
12 majority of the depositions that were taken, the cases
13 just happened to be right last summer for most of those
14 depositions to take place, and that's what happened.

15 Q. Not only depositions but as well the
16 investigation as you have described, your
17 investigator that you hired as an outside person
18 didn't really start until late March or early April
19 in conjunction with the other investigation that you
20 did during the time you were with RRA, correct?

21 A. Fair statement.

22 Q. All right. And when you were at RRA you
23 described earlier, and I won't belabor it, but you
24 described the compound I think is the word that you
25 used that Mr. Rothstein kept himself in when he was

1 Q. Okay. Were they all on the, were they,
2 were they --

3 A. Some were B.S.O as well. Some were Broward
4 Sheriff's Office. Some were from Fort Lauderdale. It
5 was both.

6 Q. With, with regard to the police officers
7 and the Sheriff's Deputy's that were present, where
8 they on every floor of RRA?

9 A. It seemed that way.

10 Q. And had you ever been in a, in a law firm
11 either as a visitor or as an employee or partner
12 where you had seen armed guards from either a
13 Sheriff's Office or a police department roaming the
14 halls?

15 A. No.

16 Q. Had you ever been to the RRA offices
17 before you accepted the job?

18 A. No.

19 Q. When you got there and you saw the armed
20 guards patrolling the floors, did you ever have a
21 conversation with Russell Adler or anyone else as
22 like what in heaven's name is going on here?

23 A. I didn't see them when I first got there.

24 Q. How much time passed before you saw the
25 guards?

1 at the firm, correct?

2 A. Correct.

3 Q. Right. And he was not accessible to
4 everyone else, true?

5 A. Right.

6 Q. And was he on your floor or was he on a
7 completely separate floor?

8 MR. SCAROLA: As opposed to a partly
9 separate floor.

10 THE WITNESS: For the most part he was on
11 a separate floor.

12 BY MR. CRITTON:

13 Q. Okay. And were there guards during the
14 time that you were at, at the RRA firm, RRA, were
15 there ever guards that patrolled the hallways?

16 A. Yes.

17 Q. And was that from the day you started?

18 A. I believe so.

19 Q. And had you ever been in a firm where --
20 bless you. Had you ever been in a firm where
21 there -- well, let me strike that. The guards were
22 what, Broward County Sheriff's Officers?

23 A. I don't remember the agency but they were
24 armed uniformed police officers. I believe Fort
25 Lauderdale.

1 A. When I first started I believe that the people
2 patrolling, I'm not sure that they initially were
3 Broward Sheriffs or Fort Lauderdale police. I think
4 that may have been a month after I began. From what I
5 remember seeing, and I can envision the people in my
6 head, they were private security people. At least that
7 was the appearance or the interpretation that I had.

8 And I didn't question it at the time who they were.

9 Q. Within --

10 A. I don't think.

11 Q. Within a short period of time though you
12 recognized that they were either Sheriff's Deputies
13 or police officers?

14 A. At the point in time where I recognized that
15 they were armed uniformed police officers in the firm,
16 yes, I questioned it not only to Russell Adler but to
17 anybody else, anybody else, because all of the lawyers
18 in the firm thought it was strange.

19 Q. Okay. And what did Adler tell you?

20 A. That Scott Rothstein has a lot of money, prior
21 to you being here, a female attorney was murdered and he
22 wants to make sure that his friends and family are as
23 secured as possible, that while he has this extra money
24 to spend on security, he is going to do that for all of
25 our safety.

1 Q. Did you understand as well that he had,
2 that the firm was paying for armed guards to guard
3 his house 24 hours a day?

4 A. No.

5 Q. When did you learn that fact?

6 A. After the disbandment of RRA

7 Q. Did Mr. Adler tell you that Mr. Rothstein
8 had amazing or substantial wealth?

9 A. I don't know in those words, but I, I
10 definitely understood that.

11 Q. Okay. In meeting Mr. Rothstein initially,
12 initially for the ten minutes as you were
13 contemplating taking a job and on the two other
14 occasions or the one other occasion when you saw him
15 out in the restaurant, I think you described him as
16 flamboyant?

17 A. I'm not sure I used that word but probably one
18 synonymous, and, yes, I would describe him as such.

19 Q. Was he someone that at least -- well, let
20 me strike that. Were you aware that he had a, a
21 watch collection of hundreds of watches?

22 A. No.

23 Q. Did you see him wear expensive jewelry
24 when you saw him; that is, the few occasions that
25 you saw him?

1 A. I went there one time.

2 Q. For what occasion?

3 A. I don't remember the occasion, but it was a
4 gathering that he had at his house and he asked, during
5 the course of me working there were ten occasions where
6 everybody was invited to go to his house for various
7 events and on one occasion, I went.

8 Q. Oh, all right. And from being in his
9 house did you recognize immediately that this was a
10 multi-million dollar house?

11 A. Yes.

12 Q. Okay. Was it on the water?

13 A. Yes.

14 Q. And could you tell from the interior
15 design or the decorations that existed that this was
16 at least a man, a man that had significant wealth?

17 A. Yes.

18 Q. All right. And could you, did you have an
19 opportunity to see his collection of automobiles?

20 A. No.

21 Q. During the time that you were in the
22 house, did you have an opportunity, did, did you
23 walk around the house?

24 A. No.

25 Q. How many people were there, best estimate?

1 A. Never. I didn't take notice of that.

2 Q. Okay. When you saw him, was he dressed in
3 a suit or was he dressed in business, or in casual,
4 more casual clothes?

5 A. Always a suit.

6 Q. And looking like a million bucks?

7 A. Looking ridiculous.

8 Q. But something that looked very expensive,
9 flashy, showy?

10 A. I couldn't tell how expensive it was, but
11 flashy and showy, yes. It may be a pink shirt with a
12 purple tie and a blue suit, something that you would
13 never expect a lawyer to be wearing, yes.

14 Q. And in terms of the, in terms of the, of
15 his personal wealth or his, his personal assets,
16 were you aware of where he lived?

17 A. Was I aware when?

18 Q. During the time you worked for RRA

19 A. Yes.

20 Q. Okay. And were you aware that he was
21 living in a multi-million dollar house?

22 A. When, when I went to the house I, I recognized
23 it as such.

24 Q. You said you went to the house. Did you
25 go to Mr. Rothstein's house?

1 Are we talking like ten or 12?

2 A. No, no, no. 250.

3 Q. Did you talk to Mr. Rothstein at all?

4 A. Not even for a second.

5 Q. Could you walk anywhere in the house that
6 you wanted?

7 A. The party, at least to the extent that I
8 participated in it, was outside. So I, I don't know if
9 I could have walked around the house, but I did not walk
10 around the house nor did I really walk inside the house
11 other than to go in the front door, straight out back,
12 and then leave the exact same pathway that I entered.

13 Q. What his property located on Castillo
14 Island?

15 A. I don't know.

16 Q. Were you aware or did you become aware
17 that Mr., during the time that you were there that
18 Mr. Rothstein had investments in multiple real
19 properties?

20 A. No.

21 Q. Were you aware at the time that you met
22 him first at the BOVA restaurant that he had an
23 interest in BOVA restaurant?

24 A. When I met him, no.

25 Q. Did he have an interest in BOVA restaurant

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1 at that time?

2 A. I heard that sometime after I began working
3 there. He certainly acted like he did.

4 Q. Did you learn that he had investments in
5 other business entities, whether they were other
6 restaurants or other business entities --

7 A. Through --

8 Q. -- during the time that you worked at RRA?

9 A. Through rumors.

10 Q. And rumor was he had his fingers in many
11 different businesses?

12 A. It sounded like hundreds.

13 Q. And did you understand that he had a
14 substantial collection of automobiles?

15 A. What do you mean by substantial selection or
16 collection?

17 Q. Well, were you, during the time that you
18 were at RRA were you aware that he had Ferraris?

19 A. No.

20 Q. Multiple Ferraris?

21 A. No.

22 Q. Were you aware that he had a Bentley?

23 A. Yes.

24 Q. Were you aware that he had a Bugatti?

25 A. I heard that.

1 Q. Were you aware that he had a Rolls Royce?

2 A. No.

3 Q. Were you aware that he had multiple
4 Corvettes?

5 A. No.

6 Q. Either a Corvette or multiple Corvettes?

7 A. No.

8 Q. Were you aware that he had multiple
9 Mercedes Benz?

10 A. No.

11 Q. Were you aware that he owned a yacht?

12 A. Yes.

13 Q. Okay. And was that parked behind his
14 house?

15 A. Yes.

16 Q. Were you aware that he also -- and did it,
17 if I was to say it was approximately an 85 to
18 90-foot yacht or, in fact, an 87-foot yacht?

19 A. I wouldn't quarrel with that.

20 Q. Did it also appear that he had a
21 substantial sport fisherman that was parked out
22 there as well?

23 A. I didn't see that.

24 Q. Were you aware that he had 33-foot Aqua,
25 Aquaviva?

1 A. No.

2 Q. Were you aware that he had multiple jet
3 skis?

4 A. No.

5 Q. Were you aware that he had a 55-foot Sea
6 Ray?

7 A. No.

8 Q. Were you aware that he owned a
9 Lamborghini?

10 A. No.

11 Q. Again during the time that you were at
12 RRA?

13 A. I understand that. The answer is no.

14 Q. In addition to the, to the business of
15 owning BOVA what other business ventures did you
16 understand he had? I think you said you thought he
17 was in hundreds of businesses.

18 A. Through a rumor.

19 Q. Right.

20 A. I understood that he owned a Vodka. I
21 understood generically that he owned or purchased
22 various patents. I understood -- I didn't know what the
23 patents were. I understood that he owned other
24 restaurants. I understood that he owned or was partial
25 owner of Cafe Iguana.

1 At some point in time I learned that he
2 was owner or partial owner of the Versace mansion.
3 And I think in general it was always explained to me
4 or I overheard he had, he has his hands in all of
5 these, this assortment of businesses and those
6 business ventures have done very well, and that is
7 the source of his apparent extreme amount of wealth.

8 Q. Who told you that?

9 A. I don't, I don't know. More, more than one
10 person. I mean, that was just kind of the word around
11 the campfire so to speak.

12 Q. Did you inquire as to -- let me strike
13 that. Did you ever see any documents that reflected
14 or documents or read any information about
15 Mr. Rothstein that preexisted 2002 which was kind of
16 the start of the RRA firm?

17 A. I don't understand.

18 Q. Okay. Well, I think we established
19 earlier that your understanding was that RRA kind of
20 started as a firm in the 2002 time frame.

21 A. Well, you told me that and I have been told
22 that after the implosion that that was the time period
23 that RRA started. I didn't know anything about Scott
24 Rothstein until the year 2009 at all.

25 Q. Did you do any research with regard to

1 Mr. Rothstein prior to going to the firm and by
2 research I mean people Google. Did you Google him?

3 A. No.

4 Q. Did you, did the firm have a brochure?

5 A. I don't know.

6 Q. Did you ever see brochures in the waiting
7 room or the reception rooms that described the firm
8 when it was founded, background of the firm, et
9 cetera?

10 A. No.

11 Q. Was it on your web site?

12 A. Was what on my web site?

13 Q. The history or the background of the firm.
14 Let me strike that. RRA had a website?

15 A. RRA had a website.

16 Q. That's no longer in existence, true?

17 A. True.

18 Q. And --

19 A. To my knowledge.

20 Q. Did you ever go on the website and
21 checkout the web site for the history or the
22 background of RRA and Mr. Rothstein?

23 A. I went on the website. I don't know that the
24 website even had a history. If it did, I don't remember
25 ever looking at it.

1 matters with regard --

2 MR. CRITTON: Form?

3 MR. SCAROLA: -- to these cases?

4 MR. CRITTON: Form?

5 MR. SCAROLA: No, no. It's a, it's a
6 speaking inquiry.

7 BY MR. CRITTON:

8 Q. Mr. Edwards, did you ever have any
9 dealings with Deborah Villegas?

10 A. No.

11 Q. Am I saying it right?

12 A. I don't know.

13 Q. V-i-l-l-e-g-a-s?

14 A. I've seen the name.

15 Q. Did you know who she was?

16 A. In what way?

17 Q. As it related --

18 A. I knew that she worked for the firm.

19 Q. What did you understand her position was?

20 A. Rothstein's Sarah Kellen.

21 Q. Did you understand her to be the COO of
22 the company, of the firm?

23 A. Right. I don't know if COO or whatever, but
24 his right-hand man; that's the person who gets him what
25 he wants. That's at least in a broad term what I

1 Q. Did it, did, at least from what you saw
2 and observed of Mr. Rothstein, did it appear to you
3 that the, his wealth far exceeded the type of
4 business that it appeared to you that the firm was
5 doing?

6 A. I have no understanding whatsoever. No,
7 that's not something that ever crossed my mind.

8 Q. Well, under these circumstances is, is
9 when you went to the firm, you had the ability to
10 your discretion to spend whatever monies you wanted
11 in prosecuting your personal injury and Epstein
12 cases. You, no one ever turned down a request
13 either for a reimbursement or told you not to expend
14 any money, true?

15 MR. SCAROLA: Objection, compound and
16 repetitious.

17 THE WITNESS: I don't understand the
18 question.

19 BY MR. CRITTON:

20 Q. No one, as to any expenditure that you
21 ever made on an Epstein case --

22 MR. SCAROLA: Isn't this about the fourth
23 time that you're eliciting exactly the same
24 testimony? Isn't it very clear the extent to
25 which Mr. Edwards had control over financial

1 understood her position to be.

2 Q. Did you understand she was a financial
3 person?

4 A. No.

5 Q. Or an administrative person?

6 A. My understanding was administrative.

7 Q. With regard to Mr. Rothstein's; that is,
8 his real property, his vehicles, his boats, his
9 business interests, would it be a correct statement,
10 sir, that you weren't concerned about the source of
11 his wealth?

12 A. You went through a list of the things that I
13 knew or did not know him to have in terms of assets.
14 And I told you for the most part I didn't even know that
15 he had those things. In fact, while you were out of the
16 room, I just educated myself by reading the information
17 on some of the things he had and I didn't know until
18 right now that he had those things. But certainly while
19 I was working at RRA I didn't know that he had those
20 things.

21 Q. Then let me be specific. With regard to
22 the, with regard to the house that you knew he had,
23 with regard to the yacht that you knew he had, with
24 regard to the vehicles that you knew he had, with
25 regard to the business interests, at least BOVA and

1 at least what was rumored to be his business
2 interest, did you believe that the source of his, of
3 his apparent wealth was as a result of the law firm?

4 A. I believe that the source of his wealth was
5 the law firm as well as the, what I have described as an
6 assortment of businesses that he had his hands in of
7 which only a fraction I was aware.

8 Q. Well, what did you understand to be the
9 source of the funding of the, of the Epstein cases
10 and the other lawsuits that you had?

11 A. The checks I believe were written by the law
12 firm.

13 Q. Okay. And what did you believe was the
14 source of the monies that the law firm got to expend
15 some, just on the three cases that you had with Mr.
16 Epstein, some three to \$500,000, I mean separate and
17 apart from all of the, your other personal injury
18 cases and separate and apart from all of the other
19 69 lawyers who were in the law firm who also had
20 cases?

21 A. I didn't have a belief at all as to the source
22 of any of the monies that were used for any of the case.

23 Q. Was it your position it really wasn't your
24 concern; that is, wherever the money came from, it
25 didn't bother you; all you knew is that the firm was

1 things of that nature.

2 Q. And that's my question to you: Did you
3 hear these names before or during the time that you
4 were at RRA as distinct from now?

5 A. Of that list you just read until right this
6 second, Michael Szafranski is the only one that I have
7 ever heard of and that was after implosion of RRA

8 Q. And again this question is specific to the
9 time frame --

10 A. Sure.

11 Q. -- that you were there? Dominic
12 Ponatchio, P-o-n-a-t-c-h-i-o.

13 A. No.

14 Q. Moto, M-o-t-o, Ban, B-a-n, Adon, A-d-o-n?

15 A. No.

16 Q. Ever heard of Benozon (phonetic) Varon,
17 V-a-r-o-n?

18 A. No.

19 Q. Onyx Capital?

20 A. No.

21 Q. Onyx Options Consultants?

22 A. No.

23 Q. BWS Investments?

24 A. No.

25 Q. Pirulin, P-i-r-u-l-i-n, Group?

1 funding your cases?

2 MR. SCAROLA: Objection, argumentative.

3 THE WITNESS: Yeah. At the time I believe
4 that I am working at a well recognized law firm
5 with good people and that is a successful law
6 firm and this is the way that law firms at that
7 level operate, and right, I didn't --

8 BY MR. CRITTON:

9 Q. Didn't care?

10 A. Right, I didn't care. I didn't question it.

11 Q. With, with regard to, let me ask you some
12 names and see if you recognize the names. Do you
13 know a person by the name of Barry Bekkadan,
14 B-e-k-k-a-d-a-n?

15 A. Never heard the name until right now.

16 Q. A.J. Discala?

17 A. Again same answer.

18 Q. Clockwork Capital Advisers?

19 A. No, never heard of them.

20 Q. Razorback Funding?

21 A. Nerve heard of it.

22 Q. Michael Szafranski, S-z-a-f-r-a-n-s-k-i?

23 A. Heard that name --

24 Q. And --

25 A. -- only after implosion and through papers and

1 A. No.

2 Q. Shimone (phonetic) Levy, L-e-v-y?

3 A. No.

4 Q. Obidia Levy, O-b-i-d-e, I'm sorry, d-i-a?

5 A. No.

6 Q. Daniel Minkowitz, M-i-n-k-o-w-i-t-z?

7 A. No.

8 Q. Fortress, an entity know as Fortress
9 Investments or Fortress Capital?

10 A. No.

11 Q. Drawbridge?

12 A. No.

13 Q. Capital or funding?

14 A. No.

15 Q. Do you know an individual by the name of,
16 have you ever heard of, heard during that time
17 period, did you hear of or know a person named
18 George Levin, L-e-v-i-n?

19 A. No.

20 Q. Banyan Investment Fund?

21 A. No.

22 Q. Did you know or hear of the name Frank
23 Preve, P-r-e-v-e?

24 A. No.

25 Q. Okay. Mr. Preve is purportedly, was

1 purported to have an office within RRA's offices.
2 Have you seen that?

3 A. Have I seen what?

4 Q. Have you seen that in any of the news
5 media, that Mr. Preve had an office within RRA?

6 A. That name doesn't sound familiar at all. So,
7 no, the answer to your question is no, I haven't seen
8 that.

9 Q. Bill Brock?

10 A. Yes.

11 Q. Okay. Who is Mr. Brock?

12 A. In the law firm he went by the name Uncle
13 Bill.

14 Q. Okay. All right. Who is Uncle Bill?

15 A. Who do I understand him to be? I don't know
16 who he really was. At this point in time looking back,
17 there is no telling what anyone, what anyone or anything
18 was. But at the time I believe that he was a relative
19 of Scott Rothstein's.

20 Q. What did he do? What did, what did Uncle
21 Bill do --

22 A. Some --

23 Q. -- at the firm?

24 A. Something with money.

25 Q. Did he have an office at the firm?

1 A. No.

2 Q. Ed Morse?

3 A. No.

4 Q. Richard Pearson, P-e-a-r-s-o-n?

5 A. No.

6 Q. Steven Levin, L-e-v-i-n?

7 A. No.

8 Q. Ira Sochet? S-h or Sochet, S-o-c-h-e-t?

9 A. No.

10 Q. Mark Melvin?

11 A. No.

12 Q. Jack Samoney (phonetic)?

13 A. No.

14 Q. Lawrence King?

15 A. No.

16 Q. Steve Jackel?

17 A. No.

18 Q. Have you ever heard an attorney name
19 Michael Legamaro?

20 A. No.

21 Q. Kevin Draher, D-r-a-h-e-r?

22 A. No.

23 Q. David Boden, do you know David Boden?

24 A. Yes.

25 Q. Okay. Who is Mr. Boden, an associate --

1 A. I think the trustees are still trying to
2 figure out what he exactly did do.

3 Q. Did you have any dealings with him?

4 A. Dealings, no, I didn't have dealings.

5 Q. Dealings of any kind?

6 A. I talked to him.

7 Q. Did you ever discuss any of your cases?
8 Was he -- he wasn't a lawyer?

9 A. Far from it.

10 Q. All right. Did you ever discuss any of
11 your cases with him?

12 A. No.

13 Q. Just a hi, hello?

14 A. Hi, hello, and I was one of the lawyers who
15 would come in often and work on weekends and he would be
16 there. That's when I would see him, and he would kind
17 of, hey, how are you doing on a weekend.

18 Q. And do you know a Dean Kretchmar,
19 K-r-e-t-c-h-m-a-r?

20 A. No.

21 Q. Same question again, do, these names
22 during the time period, Doug Van Allman,
23 A-l-l-m-a-n?

24 A. No.

25 Q. Ted Morse?

1 A. Are you asking me what I know now or what I
2 thought then?

3 Q. Who did you understand Mr. Boden, David
4 Boden to be when you became employed or associated
5 with RRA in April of '09?

6 A. In April of '09 I had not heard the name but
7 let's just skip to it. Sometime in let's say June or
8 July, I am guessing, sometime during the summer, I
9 understood him to be a lawyer at the firm.

10 Q. Did you understand, did you understand he
11 was a Florida lawyer or you just understood he was a
12 lawyer?

13 A. I understood he was a lawyer. I made the
14 presumption or assumption at that time that since he was
15 a lawyer for RRA that he was a Florida lawyer. I have
16 subsequently learned otherwise.

17 Q. Did you know, did you ever have any
18 business dealings with Mr. Boden?

19 A. Never spoke a word to the guy.

20 Q. What did you understand that he actually
21 did at the firm?

22 A. Had no idea.

23 Q. How about Andrew Barnett?

24 A. Don't know who that is.

25 Q. There was an individual, he is described

1 as the director of Corporate Development for RRA

2 A. I don't know even know what that means.

3 Q. Have you ever heard of the Centurion
4 Credit Fund or the Platinum Management Fund?

5 A. No.

6 Q. Alan Sakowitz?

7 A. No. Wait. Alan Sakowitz. I have heard that
8 name recently. I don't know why. I believe I actually
9 heard that name in a response. Never mind. In some
10 nonresponsive answer that your client gave, I heard that
11 name.

12 MR. SCAROLA: Keep going.

13 BY MR. CRITTON:

14 Q. Mr. Edwards, with regard to your phone,
15 did you have a direct line at RRA?

16 A. Yes.

17 Q. What was that phone number?

18 A. I don't remember.

19 Q. And is your cellphone today the same as it
20 was back then?

21 A. Yes.

22 Q. And what's that number, please?

23 MR. SCAROLA: Cellphone number?

24 THE WITNESS: 954-294-9544.
25

1 Fistos is my partner now. Marc Nurik is the lawyer who
2 represents Scott Rothstein now. I don't know which it
3 was, but it was one of the two.

4 Q. Okay. Were you ever present at a meeting
5 where someone who you didn't know was present when
6 the Epstein case was discussed?

7 A. No.

8 Q. Were you ever asked to get on a phone call
9 where the Epstein cases were discussed that you
10 didn't, that you couldn't confirm who, you may have
11 someone who may have said this is Joe Smith on the
12 other line, but where you discussed the Epstein case
13 over the phone with another lawyer from your firm?

14 A. I don't understand that question.

15 Q. Did you ever make a phone call or did you
16 ever receive a phone call where you discussed the
17 Epstein case with another lawyer in your firm; that
18 is, that person --

19 A. Yes.

20 Q. -- outside of the office?

21 A. What?

22 Q. Okay. Obviously you would get calls
23 within --

24 A. Even you.

25 Q. -- the confines of your office. Right. I

1 BY MR. CRITTON:

2 Q. Did you ever have a firm cellphone or just
3 your own personal cellphone?

4 A. No. Just my own personal cellphone.

5 Q. During the time that you were at the firm,
6 were you ever involved in making any type of a
7 presentation to anyone regarding the Epstein cases?

8 A. Including other lawyers within the firm?

9 Q. Let me rephrase it. I am going to
10 rephrase. You already told us that you have talked
11 about the Epstein cases with other lawyers, correct?

12 A. Right.

13 Q. Were you ever present in a meeting where
14 there was a person whom you did not know wherein the
15 Epstein, where the Epstein cases were discussed?

16 A. No.

17 Q. At the, when you met with Mr. Rothstein
18 in his office when Mr. Adler or whoever asked you to
19 come up that one time and there was Adler, Rothstein
20 and yourself, you said there was an individual on
21 the phone?

22 A. Right. It was another lawyer with the firm.

23 Q. And how do you know it was another lawyer
24 with the firm?

25 A. It was either Marc Nurik or Mark Fistos, Mark

1 understand that.

2 A. You fall in that category. I am having a hard
3 time.

4 Q. The question is did you ever have, were
5 you ever conferenced in on a call that was supposed
6 to be among RRA lawyers regarding an Epstein case?

7 A. No.

8 Q. Did anyone ever request that you prepare a
9 summary of any of your Epstein cases that you in
10 turn sent by either e-mail or memo to anyone else?

11 A. I don't believe so.

12 Q. After you joined the RRA firm in April of
13 '09, did there come a point in time when you
14 requested that, that you requested the depositions
15 be taken out of state of a number of witness? Well,
16 let me ask you this question.

17 MR. CRITTON: Let me, let make it easy.

18 Let me show what I will mark as Exhibit 3.

19 (Plaintiff's Exhibit No. 3 was marked for
20 identification.)

21 BY MR. CRITTON:

22 Q. Before I get to that, Mr. Edwards, were
23 you aware of any cases that Mr. Rothstein himself
24 settled for over \$5 million while you were employed
25 at the firm?

1 A. I was never aware of any cases that Rothstein
2 even handled much less settled.

3 Q. Were you aware of whether, did anyone ever
4 tell you whether Mr. Rothstein even did legal work
5 at the firm or whether he was just a rainmaker?

6 A. I -- no, no one ever told me one way or the
7 other.

8 Q. Would it be a correct statement that you
9 never saw him perform any legal work during the time
10 you were at the firm?

11 A. That's a correct statement.

12 Q. Would it be a correct statement as far as
13 you knew he was kind of a gadfly going to his
14 various business ventures and then he would hole
15 himself up in the office.

16 A. He was the guy on the billboards and at the
17 Triple A arena and everything else marketing the firm
18 and bringing business in, and that's at least what I
19 believe he did. If it's true or not, I don't know to
20 this day.

21 Q. With regard to Exhibit 3, do you recognize
22 this e-mail?

23 A. I, I don't recognize the e-mail.

24 Q. Do you recognize, and I will represent to
25 you that I received the e-mail. It was sent to me

1 Q. Do you recall sending or directing that
2 this facsimile be sent. Or let me strike that. Who
3 was your secretary at that time? Who is, well, BJE
4 is you. Who is the MGL?

5 A. Who is the MGL? Let's see.

6 Q. On Page 2. There are your initials,
7 Bradley J. Edwards, BJE, and then MGL. Do you
8 recognize that?

9 A. No. I mean, as you are very aware problems
10 with secretaries during that period of time, I, I had
11 more than my share and that could have been a time
12 period where I did not have a legal assistant at all.
13 And I do not recognize the initials MGL to identify
14 anybody that I know.

15 Q. With regard to the individuals who were
16 listed in Exhibit 3, specifically Donald Trump,
17 Leslie Wexner, Bill Clinton, with those individuals,
18 you sent out this facsimile or at least your office
19 sent out the fax, Exhibit 3, requesting dates for
20 these individuals to be deposed, correct?

21 A. Yes.

22 Q. All right. Prior to your joining RRA you
23 had never requested either that the deposition of
24 Mr. Trump be taken, Mr. Wexner, nor Bill Clinton,
25 correct?

1 as well although I am not shown as a recipient, I
2 received e-mail.

3 THE WITNESS: Are you talking about the
4 fax?

5 MR. CRITTON: I am sorry, the fax.

6 MR. SCAROLA: Exhibit, Exhibit 3.

7 MR. CRITTON: Exhibit 3. Let me start
8 again. Exhibit 3 is a fax.

9 THE WITNESS: Correct.

10 MR. CRITTON: Dated July 22nd, 2009.

11 THE WITNESS: I recognize that.

12 BY MR. CRITTON:

13 Q. And do you recognize on Page 2, it says
14 very truly yours, Rothstein, Rosenfeldt, Alder and
15 then there is a, what appears to be a signature and
16 under that it says Bradley J. Edwards, Esquire,
17 partner fort (sic) the firm. Do you see that?

18 A. Yes, I see that.

19 Q. Do you recognize the signature?

20 A. No.

21 Q. Is that how you sign your name?

22 A. No.

23 Q. Do you know whose signature that is or
24 purports to be?

25 A. I have absolutely no idea.

1 A. I never requested a deposition to be taken
2 including any deposition of those three individuals.

3 Q. I understand but all right.

4 A. The answer to your question is, yes.

5 Q. All right. Thank you. Paula Heil, do you
6 know who that person is?

7 A. Do I know who it is? I know that it's
8 somebody who was involved with Bear Sterns at some point
9 in time.

10 Q. You also requested dates, and in fact
11 served a subpoena on Alan Dershowitz, the Harvard
12 law professor, correct?

13 A. Correct.

14 Q. And Mr. Dershowitz you were aware was one
15 of Mr. Epstein's criminal defense lawyers, correct?

16 A. At some point in time, I knew that in the past
17 he had been an attorney of Mr. Epstein.

18 Q. Well, you had, you had certain records
19 from the State Attorney's Office, didn't you, or
20 from the police report?

21 A. And that's what I'm saying, yes, involved in
22 the civil cases with us, no, I didn't know that he had
23 involvement. But, yes, I did know he was a former --

24 Q. I'm sorry, go ahead --

25 A. I did know that he was a former attorney of

1 Jeff Epstein.

2 Q. Well, you also understood Mr. Epstein has
3 had ongoing criminal law issues even during the time
4 of the civil case, correct?

5 A. No.

6 Q. Sure. Well, you were aware that
7 Mr. Epstein was operating under the nonprosecution
8 agreement, that he was bound by the, a
9 nonprosecution agreement, correct?

10 A. I'm aware of the existence of a nonprosecution
11 agreement.

12 Q. Well, and in fact you came into possession
13 of the nonprosecution agreement sometime in 2008
14 because Judge Marra ordered that, ordered the United
15 States Government to turn over to all of the
16 attorneys and the clients who were listed as alleged
17 victims, correct?

18 A. Yes.

19 Q. So, you had possession of the N.P.A. as of
20 sometime in the year 2008, correct?

21 A. Right.

22 Q. All right. And so you, and you were aware
23 that under the nonprosecution agreement Mr. Epstein
24 was required to meet certain requirements, that
25 Mr. Epstein had a requirement to meet certain

1 standards or certain provisions of the agreement
2 otherwise the U.S.A. could potentially declare there
3 was a breach of the agreement, true?

4 A. I suppose.

5 Q. Well, you're a former prosecutors too, so
6 you knew what a nonprosecution agreement was, true?

7 A. No, I had never seen a nonprosecution
8 agreement in my life before this one.

9 Q. When you got the nonprosecution agreement,
10 you reviewed it?

11 A. Yes, I did.

12 Q. So, you were familiar with?

13 A. Right.

14 Q. And you understood from at least looking
15 at the police report that you had access to, that
16 Mr. Dershowitz had represented Mr. Epstein with
17 regard to negotiating his plea that ultimately was
18 reached in negotiations with the federal government,
19 true?

20 A. I knew he played a role.

21 Q. Now, with regard to Mr., with regard to
22 the depositions of -- well, let me strike that.
23 Also listed both on your, on Jane Doe's and L.W.'s
24 and E.W.'s updated interrogatory answers which were
25 provided during the year 2009, an individual named

1 Tommy Mottola was listed. Do you know who
2 Mr. Mottola is?

3 A. Generally I think I know who that is.

4 Q. Who did you understand Mr. Mottola was?

5 A. Something to do with the music industry.

6 Q. All right. And the name David Copperfield
7 was also referenced as a potential witness in the
8 case, correct?

9 A. That is correct.

10 Q. All right. And did you -- and you, in
11 fact, attempted to coordinate a deposition for
12 Mr. Copperfield; is that correct?

13 MR. SCAROLA: Are you asking about whether
14 communications occurred with you --

15 MR. CRITTON: Sure.

16 MR. SCAROLA: -- regarding such a
17 deposition.

18 BY MR. CRITTON:

19 Q. Let me rephrase it. With regard to the
20 lawyers in the case, including myself, you attempted
21 to coordinate a time for completing or taking the
22 deposition of Mr. Copperfield, Mr. Mottola, who I
23 will represent is the former president of Sony
24 Records, former president Bill Clinton, Alan
25 Dershowitz, Donald Trump, and Leslie Wexner, true?

1 A. False.

2 Q. Which of those, as to which one of those
3 is that false?

4 A. Tommy Mottola.

5 Q. So, but you did attempt to coordinate the
6 depositions of Donald Trump, Mr. Dershowitz former
7 president Clinton, David Copperfield, and Leslie
8 Wexner, correct?

9 A. I believe so.

10 Q. And with regard to Mr., well, let me
11 strike that. In setting these depositions; that is,
12 in requesting these deposition be taken sometime in
13 June and July of 2009 or requesting dates for them,
14 did you have discussions with other attorneys in
15 your firm as to the benefits that would exist in
16 your case, your three cases against Mr. Epstein by
17 taking these individuals' depositions?

18 MR. SCAROLA: Objection. Same as grounds
19 previously stated; instruct you not to answer.

20 BY MR. CRITTON:

21 Q. Mr. Edwards, were you involved in the
22 discussions regarding the deposing of any of the
23 people of these individuals, Mr. Trump; that is, in
24 discussions with any other lawyers in your firm
25 including Scott Rothstein?

1 A. Weissing.
 2 Q. Or RRA, Mr. Howell, or Mr. Cassell have
 3 any interest in those cases?
 4 A. No.
 5 Q. At any time -- let me strike that. You
 6 are aware that Mr. Alfredo Garcia has pled guilty to
 7 an obstruction of justice charge based on the news?
 8 A. I don't know Alfredo Garcia at all.
 9 Q. Sorry about that. The head of Alfredo
 10 Garcia. With regard Mr. Rodriguez, Alfredo
 11 Rodriguez, are you aware through news reports that
 12 he pled guilty to obstruction of justice?
 13 A. Yes.
 14 Q. At any time have you been given access to
 15 the pamphlet book and/or any of the yellow pages
 16 that have been referenced in the criminal
 17 indictment?
 18 MR. SCAROLA: I am going to instruct you
 19 not answer that question on the basis of
 20 attorney-client and work-product privilege.
 21 BY MR. CRITTON:
 22 Q. Has the, have you been, have you had any
 23 contact with the criminal defense lawyer for
 24 Mr. Rodriguez?
 25 MR. SCAROLA: You can answer yes or no.

1 the information that is held by the FBI which would
 2 include the pamphlet and the yellow, the pamphlet
 3 and the yellow pages, true?
 4 A. I have. Adam Horowitz has, and I may or may
 5 not have piggybacked his motion. But as sitting here
 6 right now, I, I don't remember drafting that motion.
 7 Q. Are you sure he hasn't piggybacked your
 8 motion?
 9 A. I'm not sure. If you show me my motion, I can
 10 tell you whether I drafted it or not.
 11 Q. Have you --
 12 A. That, that was certainly an idea.
 13 Q. Have, have you also -- you have also
 14 served a motion to obtain FBI files that relate to
 15 Mr. Epstein; is that correct?
 16 A. Correct.
 17 Q. Okay. Have you spoken as a result of the
 18 motion that you filed, has the government, have you
 19 spoken with the United States Attorney's Office or
 20 representatives for the FBI with regard to the
 21 motion which you filed?
 22 MR. SCAROLA: Objection, privilege and
 23 instruct you not to answer.
 24 BY MR. CRITTON:
 25 Q. Have you received any type of response

1 THE WITNESS: No.
 2 BY MR. CRITTON:
 3 Q. Have you had any communication, not a
 4 conversation but any communication with the criminal
 5 defense lawyer about obtaining a copy of the
 6 pamphlet and/or the pamphlet book or the yellow
 7 pages that are referenced in the criminal indictment
 8 that were at one time in the possession of Mr.
 9 Rodriguez and that he apparently was trying to sell
 10 to the cooperating witness?
 11 MR. SCAROLA: I am going to instruct you
 12 not to answer any question about anything that
 13 you may have done in connection with the
 14 fulfillment of your responsibilities as counsel
 15 for the Plaintiffs in the three pending cases.
 16 BY MR. CRITTON:
 17 Q. Again, of course you're going to continue
 18 to follow Mr. Scarola's direction?
 19 A. On what I have done or what I have not done,
 20 all of that is work-product.
 21 Q. Well, you have filed a motion to obtain a
 22 copy of the pamphlet book and the yellow pages of
 23 Mr. Rodriguez, correct? I am sorry, either a
 24 motion -- well, strike that. You have filed a
 25 motion in federal court to obtain a copy of the, of

1 from the United States Attorney's Office or the FBI
 2 with regard to the motion that you have filed?
 3 MR. SCAROLA: You may answer that only
 4 with respect to those matters that are matters
 5 of public record; that is, if a response has
 6 been filed with the court or provided to you in
 7 the form of a pleading, you may respond.
 8 THE WITNESS: I cannot respond to that
 9 question.
 10 MR. CRITTON: All right. We're going to
 11 quit at 5. I don't want to go on.
 12 MR. SCAROLA: You already, you already
 13 missed that.
 14 MR. CRITTON: All right. Well, let's,
 15 I'll adjourn the deposition today, and I will
 16 arrange with you for a time to finish.
 17 MR. SCAROLA: Well, so that the record is
 18 clear, it is our position that you have had
 19 more than adequate time to conduct an
 20 appropriate examination of Mr. Edwards, and we
 21 will resist any further effort to depose him.
 22 MR. CRITTON: I understand your position.
 23 Disagree with it but understand it.
 24 MR. SCAROLA: Thank you.
 25 THE VIDEOGRAPHER: This concludes today's

videotape deposition of Scott Rothstein. The time is --

THE WITNESS: Whoa, whoa.

THE COURT REPORTER: Yes. Bradley Edwards.

THE WITNESS: Please don't lump me in with that guy, man.

MR. SCAROLA: This concludes the deposition of Mr. Bradley Edwards.

THE VIDEOGRAPHER: Oh, I'm sorry. This concludes the deposition of Mr. Bradley Edwards. The time is 5:07 p.m.

(A discussion was held off the record.)

THE COURT REPORTER: Did you want to order this?

MR. CRITTON: Ask me tomorrow.

MR. SCAROLA: I will take a copy of it. Let's stay on the record. We don't need to be on the video record but I want to make the statement that we would consider it entirely inappropriate for any portion of this deposition to be used for any reason whatsoever that is not directly connected with the prosecution of the pending claim against Mr. Edwards or the defense of the

counterclaims. Thank you.

MR. CRITTON: Bye.

MR. SCAROLA: Bye.

(Witness excused.)

(Deposition was concluded.)

CERTIFICATE OF OATH
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, the undersigned authority, certify that
BRADLEY J. EDWARDS, ESQUIRE personally appeared
before me and was duly sworn on the 23rd day of
March, 2010.

Dated this 5th day of April, 2010.

Gynthia J. Hopkins

Cynthia Hopkins, RPR, FPR
Notary Public - State of Florida
My Commission Expires: February 25, 2011
My Commission No.: DD 643788

CERTIFICATE
THE STATE OF FLORIDA
COUNTY OF PALM BEACH

I, Cynthia Hopkins, Registered Professional Reporter, Florida Professional Reporter and Notary Public in and for the State of Florida at large, do hereby certify that I was authorized to and did report said deposition in stenotype; and that the foregoing pages are a true and correct transcription of my shorthand notes of said deposition.

I further certify that said deposition was taken at the time and place hereinabove set forth and that the taking of said deposition was commenced and completed as hereinabove set out.

I further certify that I am not attorney or counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected with the action, nor am I financially interested in the action.

The foregoing certification of this transcript does not apply to any reproduction of the same by any means unless under the direct control and/or direction of the certifying reporter.

Dated this 5th day of April, 2010.

Cynthia Hopkins, RPR, FPR

DATE: April 5th, 2010
 TO: BRADLEY J. EDWARDS, ESQUIRE
 c/o Jack Scarola, Esquire
 SEARCY, DENNEY, SCAROLA,
 BARNHART & SHIPLEY, P.A.
 2139 Palm Beach Lakes Boulevard
 West Palm Beach, Florida 33409

IN RE: Epstein vs. Rothstein

CASE NO.: 50 2009CA040800XDDQMB AG

Please take notice that on Tuesday, the 23rd of March, 2010, you gave your deposition in the above-referred matter. At that time, you did not waive signature. It is now necessary that you sign your deposition.

As previously agreed to, the transcript will be furnished to you through your counsel. Please read the following instructions carefully:

At the end of the transcript you will find an errata sheet. As you read your deposition, any changes or corrections that you wish to make should be noted on the errata sheet, citing page and line number of said change. DO NOT write on the transcript itself. Once you have read the transcript and noted any changes, be sure to sign and date the errata sheet and return these pages to me.

If you do not read and sign the deposition within a reasonable time, the original, which has already been forwarded to the ordering attorney, may be filed with the Clerk of the Court. If you wish to waive your signature, sign your name in the blank at the bottom of this letter and return it to us.

Very truly yours,

Cynthia J. Hopkins

Cynthia Hopkins, RPR, FPR

I do hereby waive my signature.

BRADLEY J. EDWARDS, ESQUIRE

ERRATA SHEET

IN RE: EPSTEIN VS. ROTHSTEIN
 CR: Cynthia Hopkins, RPR, FPR
 DEPOSITION OF: BRADLEY J. EDWARDS, ESQUIRE
 TAKEN: March 23, 2010
 JOB NO.: 1333

DO NOT WRITE ON TRANSCRIPT - ENTER CHANGES HERE
 PAGE # LINE # CHANGE REASON

Please forward the original signed errata sheet to this office so that copies may be distributed to all parties.

Under penalty of perjury, I declare that I have read my deposition and that it is true and correct subject to any changes in form or substance entered here.

DATE: _____

SIGNATURE OF
 DEPONENT: _____

CERTIFICATE

THE STATE OF FLORIDA
 COUNTY OF PALM BEACH

I hereby certify that I have read the foregoing deposition by me given, and that the statements contained herein are true and correct to the best of my knowledge and belief, with the exception of any corrections or notations made on the errata sheet, if one was executed.

Dated this _____ day of _____, 2010.

BRADLEY J. EDWARDS, ESQUIRE
 Job #1333