

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT, IN AND FOR PALM
BEACH COUNTY, FLORIDA

Case No. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

10 SEP 17 PM 3:39
CLERK, BUCK, CIRCUIT
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 4
FILED

DEFENDANT/COUNTERPLAINTIFF BRADLEY J. EDWARDS' REQUEST FOR
ADMISSIONS AND INTERROGATORY TO PLAINTIFF/COUNTERDEFENDANT
JEFFREY EPSTEIN

COMES NOW, the Defendant/Counterplaintiff, BRADLEY J. EDWARDS, by and through his undersigned counsel, and files this, his Request for Admissions to the Plaintiff/Counterdefendant, JEFFREY EPSTEIN, and requests that Plaintiff/Counterdefendant admit or deny the following facts, in accordance with Rule 1.370, Fla.R.Civ.P.:

ADMISSIONS

1. You have acted on a sexual preference for minor females* on multiple occasions over the course of at least the last decade.
2. You have engaged in sexual activity** with more than forty minor girls between 2002 and 2006 in your residence in West Palm Beach, Florida.

* "minor females" is defined as females who were known by you at the time or who are now known to you to have been under 18 years of age at the time of your interaction with them, and females who you now have reason to believe may have been under 18 years of age at the time of your interaction with them.

** "sexual activity" for purposes of these interrogatories means any physical contact with the genitals or exposed breasts of another person.

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3. Among the minor females with whom you have engaged in sexual activity between 2002 and 2006 was a person identified in a civil suit filed against you as:

- a. Jane Doe
- b. E.W.
- c. L.M.

4. You paid to engage in sexual activity with minor females between 2002 and 2006, including the following persons identified in legal pleadings as: C.W., C.L., A.H., S.G., A.D., V.A., N.R., J.S., V.Z., J.A., F.E., M.L., M.D., D.D., D.N. and :

- a. Jane Doe
- b. E.W.
- c. L.M.

5. When you engaged in sexual activity with minor females between 2002 and 2006, you knew or had substantial reason to believe at the time that they were under the age of 18.

6. A document maintained by your employee, Mr. Alfredo Rodriguez, contains the names of dozens of minor girls with whom you had sexual relations and sexual interaction in West Palm Beach, New York, New Mexico, California, Michigan, the Virgin Islands and/or Paris, France including:

- a. Jane Doe

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b. E.W.

c. L.M.

7. You socialized with minor females in the presence of Donald Trump, Alan Dershowitz, Bill Clinton, Tommy Mattola, David Copperfield, and Bill Richardson.

8. You have transported on your airplanes minor females with whom you have engaged in sexual activity.

9. You engaged in the act of trafficking minors across state or country borders for the purpose of sex or prostitution between 1997 and the present.

10. You filed an intentionally frivolous lawsuit against Bradley J. Edwards for the purpose of deterring his prosecution of claims against you.

11. The purpose of you filing the lawsuit against Bradley J. Edwards or L.M. was to induce the settlement of pending civil lawsuits against you.

12. You made allegations in your Complaint against Bradley J. Edwards knowing at the time that you had no good faith basis to believe the allegations were true.

13. Since 2006, knowing that significant civil lawsuits would be filed against you, you have transferred assets with a total value in excess of \$10 million with the intent to defeat the ability of the civil litigants who had filed suits against you to collect on any judgments they might obtain.

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14. You are currently in the process of transferring assets with the intent to defeat the ability of Bradley J. Edwards, Esq. to collect any judgment he might obtain on his counterclaim against you in this lawsuit.

15. You have retitled and continue to retitle assets that you own directly or indirectly (including vehicles, vessels, and airplanes) in the name of other individuals to conceal those assets from potential judgment creditors.

16. When civil lawsuits were filed against you by Jane Doe, L.M. and E.W., you knew that the lawsuits would likely result in substantial judgments against you if they proceeded to trial.

17. When you filed your suit against Bradley J. Edwards in this case, you knew that you had engaged in sexual activity with the minor females he was representing and that it was likely you would be found civilly liable to them for substantial compensatory and punitive damages if their claims proceeded to trial.

18. On or before July 1, 2010, you arranged for a private investigator to conduct surveillance on Jane Doe.

19. The private investigator hired by you to conduct surveillance on Jane Doe tailed her, parked his car in close proximity to her home, and shined headlights into her home at night.

20. When you filed this lawsuit against Bradley J. Edwards, you knew that it had no basis in fact.

21. When you filed this lawsuit against Bradley J. Edwards, you knew that there was no evidence that he was involved in any false statements that may have been made by Scott Rothstein concerning lawsuits against you.

22. Bradley J. Edwards never made any false statements of fact to you.

23. All attorneys' fees and costs incurred by you to defend against lawsuits filed against you by L.M., E.W., Jane Doe, and other minor females with whom you engaged in sexual activity were incurred because you chose to defend against claims which you knew to be meritorious.

24. Lacking any substantive defense to the sexual assault claims filed against you by Jane Doe, E.W., L.M., and other minor females, you sought to avoid your compensatory and punitive liability by employing your financial resources to intimidate your victims into abandoning their legitimate claims or resolving those claims for substantially less than their just value.

25. You have no personal and direct knowledge that Bradley J. Edwards engaged in any unethical, illegal or improper conduct.

26. You filed your complaint in this case alleging that Bradley J. Edwards was a knowing participant in a civil theft and criminal enterprise when you were well aware that there was no admissible evidence to support such false assertions.

27. Your goals in filing this lawsuit included harassing Bradley J. Edwards, causing injury to his reputation, interfering with his professional relationships, and causing him to divert

time and attention away from effectively representing L.M., E.W., and Jane Doe in their lawsuits against you.

28. Unless substantial punitive damages are awarded against you, you will continue to file meritless lawsuits like the one you filed against Bradley J. Edwards and L.M. to deter other minor females with whom you have engaged in sexual activity from collecting damages from you.

29. Because of your vast wealth, unless a jury awards more than \$10 million in punitive damages against you, it will have no affect on your behavior.

INTERROGATORY

30. If your response to any of the Requests for Admissions previously submitted was other than an unqualified admission, state for each such request for admission the following:

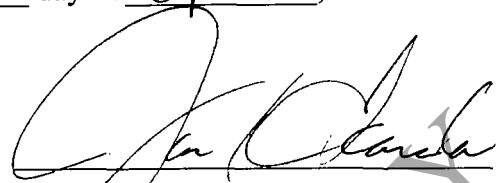
- a. All facts (not opinions) that you contend support in any manner your refusal to admit or your qualified admission.
- b. Identify all documents, notes, reports, memoranda, electronic and/or tape recordings, photographs, oral statements, or any other tangible or intangible thing that supports in any manner your refusal to admit or your qualification of your admission. Identification is to be sufficient to identify the aforesaid things in a request for production.
- c. The name and address of a custodian of all tangible or intangible things identified in response to (b) above.
- d. The name and address of all persons, including consultants, purporting to have any knowledge or factual data upon which you base your refusal to admit or the qualification of your admission.

The purpose of the interrogatory is to have you reveal everything presently known by you that bears on your refusal to admit or your qualification of your admission. The propounding parties at the time of trial will move the court for an order excluding from evidence all tangible or intangible things known to you at the time of your response to these requests for admissions and interrogatories not disclosed in your responses thereto.

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I HEREBY CERTIFY that a true copy of the foregoing was furnished by Fax and U.S.

Mail to all counsel on the attached list on this 16th day of September, 2010.



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