

IN THE CIRCUIT COURT OF THE 15<sup>th</sup> JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG  
CASE NO. 502009CA040800XXXXMB  
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

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**PLAINTIFF JEFFREY EPSTEIN'S SECOND REQUEST FOR PRODUCTION TO  
DEFENDANT/COUNTER-PLAINTIFF BRADLEY J. EDWARDS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby requests that Defendant/Counter-Plaintiff Bradley J. Edwards produce for inspection and copying those items requested in Epstein's Second Request for Production within 30 days of service at the offices of Fowler White Burnett P.A., 901 Phillips Point West, 777 South Flagler Drive, West Palm Beach, FL 33401.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail and U.S. Mail on this 9<sup>th</sup> day of December, 2011 on: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Blvd., West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.

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Joseph L. Ackerman, Jr.  
Florida Bar No. 235954

FOWLER WHITE BURNETT, P.A.  
901 Phillips Point West  
777 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone: (561) 802-9044  
Facsimile: (561) 802-9976  
Attorneys for Plaintiff Jeffrey Epstein

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**DEFINITIONS AND INSTRUCTIONS**

1. The term "Edwards," "you" or "your" means the party or parties to whom this Request for Production is addressed, i.e., Defendant/Counter-Plaintiff Bradley J. Edwards, including, all persons acting or purporting to act on his behalf.
2. "Second Amended Counterclaim" means the Second Amended Counterclaim which you served on November 29, 2011 on the Plaintiff/Counter-Defendant Jeffrey Epstein in this action.
3. The term "witness" means any natural person, individual, proprietorship, partnership, limited liability company, corporation, affiliate, subsidiary, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity.
4. The terms "identify," "describe" or "provide" when used with reference to a natural person means:
  - A. the full name, current telephone number(s) and current business and home addresses (or, if the current telephone number and/or current business and home addresses are not known, the last known telephone numbers and/or business and home addresses) of the person. Addresses shall include the street and post office box if known and the city, state, country and zip code;
  - B. the full name and address of each employer, each corporation of which the person is an officer or director, and each limited liability company of which the person is a

manager or a member, each partnership of which the person is a partner, and each other business in which the person is a principal;

- C. the person's current (or, if the current is not known, the last known) position, and the position or positions held by the person at the time of the act to which the response to a specific request relates; and
- D. such other information as is sufficient to provide full identification of the person.

5. The terms "identify," "describe" or "provide" when used with reference to any entity other than a natural person means:

- A. the full name of the entity, the type of entity (e.g., corporation, limited liability company, partnership, etc.), the address of its principal place of business, its principal business activity, the jurisdiction under the laws of which it has been organized and the date of such organization;
- B. each of the entity's officers, directors, shareholders, managers, members, partners or other principals.
- C. any other available information concerning the existence or identity of the entity.

6. The terms "identify," "describe" or "provide" when used with reference to a document means:

- A. the name or designation of the document;

B. the name of the person(s) who participated in the creation of the document;

C. the date of the document;

D. the person or entity to whom the document is addressed (if any) and those to whom any copies of the document were addressed or delivered;

E. a brief description of the contents of the document; and

F. all signatories to the document.

7. "Document" means any agreement, contract, letter, correspondence, memorandum, report, calendar, diary, appointment book, log, record (including business, financial and medical records), ledger, audit, bill, invoice, statement, schedule, recording of sound or photographs, electronic file (whether on disk, tape, drive or otherwise), printout, writing, drawing, sketch, notes (handwritten or otherwise), map, blueprint, e-mail, data compilation, and written or recorded material of any kind and character.

8. "Referring to," "reflecting," "evidencing" or "relating to" means in any way directly or indirectly, concerning, referring to, disclosing, describing, confirming, supporting, evidencing or representing.

9. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request which might otherwise be construed to be outside its scope.

10. "Person" means any individual natural person, partnership, association, firm, limited liability company, corporation, organization, trust, governmental or public entity, and any

of the officers, directors, shareholders, members, managers, partners, agents, employees, assigns or representatives of the same.

11. "Substantiate," "state" or "explain" means to produce documents or things that set forth the circumstances or bases for any belief, contention or position or give information or direction in response to a request.

12. If documents or things that are responsive to all or part of a specific request are not within your custody, possession or control, for each, state when it was last in your custody, possession or control, and why it is no longer in your custody, possession, or control and identify the person(s) that you know has or last had or that you believe has or last had custody, possession or control of such document or thing.

13. If you do not presently have in your custody, possession or control, documents or things that are responsive to a request, include a statement to that effect, and at such time as any responsive document or thing comes into your custody, possession or control, produce same within ten days of its location, and in any event, produce it no less than ten days prior to trial.

14. Except where otherwise stated, the time period for the requests made herein is January 1, 2008 through the present.

**REQUESTS**

1. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered damage to your reputation as a result of the filing of this action against you.
2. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered damage as a result of interference in your professional relationships.
3. Each and every document that tends to support any claim you are making for special damages, including loss of income; this request specifically shall include, but not be limited to, production of your federal income tax returns for 2007, 2008, 2009, 2010, and records of income in 2011.
4. Each and every document that tends to support the claim in your Second Amended Counterclaim that you have suffered money damages resulting from the loss of the value of your time diverted from your professional responsibilities; this request specifically shall include, but not be limited to, the production of all your time and billing records, calendars and diaries from 2009 through the date on which you respond to this request.
5. Each and every document, including, but not limited to, invoices and statements, that tends to support the claim in your Second Amended Counterclaim that you have paid money or incurred obligations to pay money for your defense in this lawsuit.
6. Each and every document evidencing communications from others with respect to your reputation and standing in the legal community.

7. Witness statements you intend to use in this case.
8. All invoices and statements for legal services and costs incurred for the defense of this action against you.
9. Each agreement or other writing memorializing the arrangement pursuant to which you are receiving legal services for the defense of this action, including but not limited to a retainer agreement with Searcy Denney Scarola Barnhart & Shipley, P.A.
10. Each and every document that tends to show that your reputation has been damaged as a result of your relationship with Rothstein, Rosenfeldt & Adler.
11. Each and every document reflecting gross collections received from your providing services as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011.
12. Invoices, statements of account or other documents reflecting treatment for any physical or psychological injury you claim to have suffered as a result of this action being brought against you.
13. Each and every document reflecting the method used in calculating your loss of income, whether by wages or other remuneration, for the period you claim to have suffered damages.
14. Each and every document reflecting the method used in calculating your alleged loss of future earning capacity as a direct result of the allegedly wrongful conduct.
15. Each and every document reflecting all lost business opportunities you claim to have suffered between 2009 and the present.

16. Each and every document reflecting the identity of the confidential source(s) listed on your Privilege Log dated February 23, 2011.
17. Each and every document reflecting the legal authority that justifies your refusal to disclose the identity of the person(s) identified as a confidential source in your Privilege Log dated February 23, 2011.
18. All closing statements for all clients who you represented that brought claims against the Plaintiff (and all other documents with respect to such clients), reflecting amounts paid to such clients or to you, your time, referring attorneys and amounts paid to the same, advance costs, and payments to any other person or entity.
19. All records of your contacts with the press or other media outlets.
20. Any agreements and communications relating to agreements or potential agreements for the sale of, development of, or any other transaction relating to, movie, book or other rights that you may or will benefit from which are related to the claims you or your clients brought against the Plaintiff.
21. All documents supporting your alleged belief that law enforcement is still investigating the Plaintiff/Counter-Defendant Jeffrey Epstein, including those reflecting communications with or information received from the government/law enforcement, media, other attorneys, or anyone else from which you claim to form this belief.
22. All documents supporting your claim that "others still persist in prosecuting claims against Jeffrey Epstein."

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23. All documents supporting your claims in Paragraphs 9 and 25 of the Second Amended Counterclaim in which you allege the sole purpose of filing civil claims was never to recover monetary damages, that Plaintiff/Counter-Defendant Jeffrey Epstein knew he never suffered monetary damages, and that he knowingly asserted baseless and unsupportable claims, etc.

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