

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

NOTICE OF TAKING DEPOSITION DUCES TECUM

TO: All counsel on the attached Counsel List

PLEASE TAKE NOTICE that the undersigned attorneys will take the Duces Tecum deposition(s) of:

<u>NAME AND ADDRESS</u>	<u>DATE AND TIME</u>	<u>LOCATION</u>
John G. White, III, Esq. (Expert)	August 26, 2015 10:00 a.m.	Searcy Denney Scarola Barnhart & Shipley, P.A. 2130 Palm Beach Lakes Boulevard West Palm Beach, FL

***DUCES TECUM: TO HAVE AND BRING WITH YOU AT THE TIME OF THE DEPOSITION THE FOLLOWING:**

**SCHEDULE "A"
DUCES TECUM**

In compliance with Florida Rule of Civil Procedure 1.280(b)(4) (1997) and the Florida Supreme Court's decision in Elkins v. Syken, 672 So. 2d 517 (Fla. 1966), we request that you bring with you to your deposition the following items if they exist:

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1. Any and all data, documents, papers, photographs, filing, video tapes, memoranda or other writings prepared by you pursuant to your employment in this case.
2. All photographs viewed and/or taken by or for you in connection with this case.
3. Copies of all statements, written or recorded, which you have examined in connection with this case.
4. All published professional standards or guidelines used or referred to by you in formulating your opinion in connection with this case.
5. All professional literature, treatises, textbooks or other publications which you regard as authoritative in connection with this case.
6. Copies of all published articles written by or contributed to by you within the past three (3) years, or drafts of speeches given by you with the past three (3) years, which affect your opinion in this case.
7. Copies of any published articles written by others on which you have relied that affect your opinion in this case.
8. Copies of any transcripts of testimony, if available, given in other cases in which you have testified (either in deposition or trial) in the past two years.
9. Copies of any reports prepared by you and furnished to the plaintiff or his attorney.
10. Any drawings, graphs, charts, illustrations or plans prepared by you in connection with this matter.
11. Copies of any and all notes, calculations or other data prepared by you in formulating your opinion in connection with this case.
12. Any professional publications, treatises, textbooks or other publications which you have examined in formulating your opinion in connection with this case.
13. Office records indicating time spent on your undertaking and hourly charges therefore in connection with this case.
14. Reports of any other experts which you have read.

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15. Any published monograms, treatises, manuals, textbooks or other documents used as a reference by you in connection with this case.

16. Copies of any correspondence between you or your office and counsel for the plaintiff, including but not limited to written letters, a hard copy of any and all e-mail communication by and among you and counsel for plaintiff and any of the counsel's representatives including secretaries, paralegals and legal assistants, as well as a hard copy of any e-mail communication between you and any other person regarding this matter.

17. Copies of any correspondence written by you or received from others with whom you have consulted in connection with this case, including but not limited to a hard copy of any and all e-mail communications.

18. Any memoranda reviewed which the attorney engaging you, an investigator, a paralegal, or an adjuster in connection with this case prepared.

19. Any other document or writing of any kind or description which you have viewed in formulating your conclusion in connection with this case.

20. Any and all charts, diagrams, overlays, graphs, photographic enlargements or other demonstrative aids prepared or to be used by you at trial or in aid of your opinions and/or testimony.

21. A copy of your current curriculum vitae.

22. An approximation of the portion of your professional time and/or work devoted to service as an expert for defendant during the past three years. This estimate should be based on (1) hours expended, (2) income earned, or (3) the approximate number of examinations performed annually.

23. All lists of cases in which you have testified as an expert at trial or in deposition which you compiled pursuant to Federal Rule of Civil Procedure 26, any similar state rule, or any court order.

AND any and all materials that you have reviewed in preparation for your testimony.

upon oral examination before Phipps Reporting, Inc., a Notary Public; or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken

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for the purpose of discovery, for uses at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 13th day of August, 2015.



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E-TRANSCRIPT, ASCII, CD AND/OR DVD REQUESTED

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“If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact , Americans with Disabilities Act Coordinator at least 7 days before your scheduled court appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than 7 days; if you are hearing or voice impaired, call 711.”

“Si usted es una persona minusválida que necesita algún acomodamiento para poder participar en este procedimiento, usted tiene derecho, sin tener gastos propios, a que se le provea cierta ayuda. Tenga la amabilidad de ponerse en contacto con , Americans with Disabilities Act Coordinator por lo menos 7 días antes de la cita fijada para su comparecencia en los tribunales, o inmediatamente después de recibir esta notificación si el tiempo antes de la comparecencia que se ha programado es menos de 7 días; si usted tiene discapacitación del oído o de la voz, llame al 711.”

“Si ou se yon moun ki enfim ki bezwen akomodasyon pou w ka patisipe nan pwosedi sa, ou kalifye san ou pa gen okenn lajan pou w peye, gen pwovizyon pou jwen kèk èd. Tanpri kontakte , Americans with Disabilities Act Coordinator nan 7 jou anvan dat ou gen randevou pou parèt nan tribunal la, oubyen imedyatman apre ou fin resevwa konvokasyon an si lè ou gen pou w parèt nan tribunal la mwens ke 7 jou; si ou gen pwoblèm pou w tandé oubyen pale, rele 711.”