

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

JEFFREY EPSTEIN,

Complex Litigation, Fla.R.Civ.Pro. 1.201

Plaintiff/Counter-Defendant,

Case No. 502009CA040800XXXXMBAG

v.

SCOTT ROTHSTEIN, Individually,
BRADLEY J. EDWARDS, Individually,

Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN'S MOTION TO
ENLARGE TIME TO RESPOND TO EDWARDS' ADDITIONAL INTERROGATORY**

Plaintiff/Counter-Defendant, Jeffrey Epstein, ("Epstein"), by and through his undersigned counsel, and pursuant to the Florida Rules of Civil Procedure, files this Motion to Enlarge Time to Respond to Defendant, Counter/Plaintiff, Bradley J. Edwards' Additional Interrogatory. The grounds for this motion are as follows:

1. On April 1, 2011, Defendant, Counter/Plaintiff, Bradley J. Edwards ("Edwards") served by facsimile his Notice of Propounding Interrogatory a/k/a Additional Interrogatory to Epstein. A copy of this discovery request is attached hereto as Exhibit "A".
2. The deadline for Epstein to respond to this discovery request is May 2, 2011.
3. Initially, Mr. Edwards submitted interrogatories in excess of the permissive number. The parties agreed to allow an excess number of interrogatories and the court entered an agreed order expanding the number of interrogatories on October 5, 2010.
4. The number of interrogatories for which Edwards seeks a response is approximately 68 interrogatories.

5. Edwards has pending with this discovery his Motion to Permit Additional Interrogatory which motion has not be set before this court for hearing.

6. Epstein requests an extension of fourteen (14) days within which to serve his response to Edwards' Additional Interrogatory faxed April 1, 2011.

8. Undersigned counsel certifies that this request is made in good faith and not for the purpose of delay. The undersigned counsel further certifies that he has and will continue to make an effort to resolve this matter without the need of a hearing.

WHEREFORE, the Plaintiff/Counter-Defendant, Jeffrey Epstein, respectfully requests that this Court grant an extension of fourteen (14) days; i.e. up to and including May 16, 2011 in which to serve a response to Edwards' Additional Interrogatory.

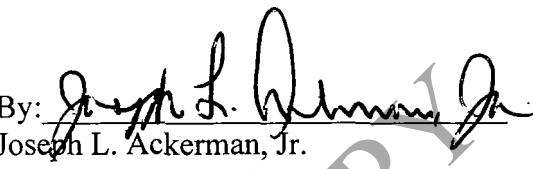
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been duly furnished via Email, Facsimile, U.S. Mail, Hand Delivery, Federal Express this 2d day of May, 2011 to:

Jack Scarola, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

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By: 

Joseph L. Ackerman, Jr.

Fla. Bar No. 235954

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Attorneys for Jeffrey Epstein, Plaintiff/
Counter-Defendant

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

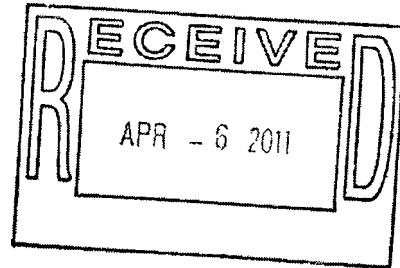
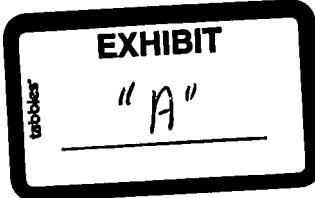
SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

NOTICE OF PROPOUNDING INTERROGATORY
TO PLAINTIFF, JEFFREY EPSTEIN

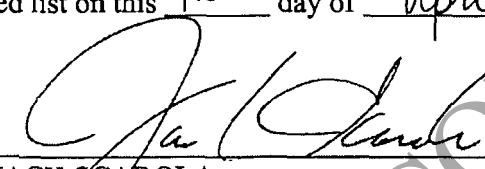
Defendant, Bradley J. Edwards, hereby provides notice that pursuant to Rule 1.340(e),
Florida Rules of Civil Procedure, that one (1) Interrogatory has been directed to Plaintiff, Jeffrey
Epstein, this 1st day of April, 2011.

It is requested that the aforesaid answers be served within thirty (30) days at the offices of
Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West
Palm Beach, Florida, 33409.



Case No.: 502009CA040800XXXXMBAG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by *FAX AND*
U.S. Mail to all Counsel on the attached list on this 10 day of April, 2011.



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COUNSEL LIST

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Attorneys for Scott Rothstein

INTERROGATORY TO PLAINTIFF, JEFFREY EPSTEIN

(If answering for another person or entity, answer with respect to that person or entity, unless otherwise stated.)

1. As to every act characterized by the Plaintiff as an alleged "abuse of process" by Bradley Edwards, state the following:
 - a. An exact and detailed description of the "process" including the title of all pleadings or other documents which Plaintiff contends were abusive;
 - b. The date on which each alleged abuse occurred;
 - c. The nature of the damage suffered by the Plaintiff as a consequence of this abuse;
 - d. The amount of the damage alleged to have been caused by the abuse.

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STATE OF _____)

COUNTY OF _____)

The foregoing instrument was acknowledged before me this _____ day of
_____, 20_____, by _____, who is personally known to
me or who has produced _____ as identification and who did/did
not take an oath.

(SEAL)

(Notary signature)

(Notary name - print)

NOTARY PUBLIC, State of Florida

(Serial number, if any)