

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).

MOTION FOR PROTECTIVE ORDER

BRADLEY EDWARDS, by and through his undersigned attorneys, move this Honorable Court for the entry of an Order of Protection limiting the production required in response to the attached Amended Notice of Taking Deposition Duces Tecum on the grounds that production requested is overly broad, irrelevant, immaterial, not reasonably calculated to lead to the discovery of admissible evidence, and is unnecessarily intrusive into the financial privacy of BRADLEY EDWARDS.

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 25th day of APRIL, 2013.



Jack Scarola

Florida Bar No.: 169440

Primary E-mail: jsx@searcylaw.com

Secondary E-mail(s): mep@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: (561) 383-9451

Attorneys for BRADLEY J. EDWARDS

COUNSEL LIST

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com;
smahoney@agwpa.com
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire
staff.efile@pathtojustice.com
Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, FL
425 North Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954) 524-2820
Fax: (954) 524-2822

Fred Haddad, Esquire
Dee@FredHaddadLaw.com;
haddadfm@aol.com
Fred Haddad, P.A.
One Financial Plaza, Suite 2612

Fort Lauderdale, FL 33394
Phone: (954)-467-6767
Fax: (954)-467-3599
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire
marc@nuriklaw.com
Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein
Tonja Haddad Coleman, Esquire
tonja@tonjahaddad.com;
Debbie@Tonjahaddad.com
Tonja Haddad, P.A.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

AMENDED NOTICE OF TAKING DEPOSITION DUCES TECUM
(VIDEOTAPED)

PLEASE TAKE NOTICE that Pursuant to Rule 1.410 of the *Florida Rules of Civil Procedure*, the undersigned attorney will take the deposition of **Defendant/Counter-Plaintiff Bradley J. Edwards** on **Wednesday, May 15, 2013 at 10:00AM** at **Empire Legal Support, Inc., 401 East Las Olas Boulevard, Suite 1400, Fort Lauderdale, FL 33301**, upon oral examination before Empire Legal Support, Notaries Public, or any other notary public or officer authorized by law to take depositions in the state of Florida. The oral examination will continue all day and day to day thereafter until completed. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

If you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed. This includes bringing with you the documents listed in "Schedule A" attached hereto.

We hereby certify that this date was coordinated with opposing counsel, and that a true and correct copy of this amended notice was served upon all parties listed in the service list below, via Electronic Service, this April 23, 2013.

/s/ Tonja Haddad Coleman

Tonja Haddad Coleman, Esq.

Fla. Bar No.: 0176737

LAW OFFICES OF TONJA HADDAD, PA

315 SE 7th Street

Suite 301

Fort Lauderdale, Florida 33301

954.467.1223

954.337.3716 (facsimile)

Tonja@tonjahaddad.com

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SCHEDULE A
(To Bring With You For Deposition)

1. Copies of income tax returns for the past five (5) calendar years of the Defendant/Counter-Plaintiff Bradley J. Edwards (hereinafter "Edwards") (2007-2012).
2. Income tax records for the current tax year, and copies of any estimated income tax returns filed for the current year for Edwards.
3. Copies of income tax returns, distributions, schedule K-1, and any and all other documents related to the gross income for the past four (4) calendar years of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
4. Copies of all documentation related to all settlements, attorneys' fees awards, jury verdict awards, and arbitration/mediation income received by Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., and/or Bradley J. Edwards, PA.
5. Income tax records for the current tax year, and copies of any estimated income tax returns filed for the current year for Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
6. A copy of Edwards's (or Bradley J. Edwards, PA's) partnership agreement with Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
7. Copies of any and all memoranda, diaries, journals, appointment books, calendars, electronic mails, notes, correspondence, or other documents upon which you rely in support of your allegation of lost income/value of time diverted from your professional responsibilities as alleged in your Counterclaim.
8. Copies of any and all memoranda, diaries, journals, appointment books, calendars, electronic mails, notes, correspondence, or other documents upon which you rely in support of your allegation of injury to your reputation as alleged in your Counterclaim.
9. Copies of any and all receipts, reports, invoices, or other documents evidencing treatment for your mental anguish, embarrassment, and anxiety as alleged in your Counterclaim.
10. Copies of any and all receipts, reports, or invoices evidencing lost income suffered as a result of your mental anguish, embarrassment, and anxiety as alleged in your Counterclaim.
11. Copies of any and all memoranda, diaries, journals, appointment books, calendars, electronic mails, notes, correspondence or other documents upon which you rely in support of your claim for Punitive Damages.

12. Copies of any and all documents you intend to introduce at trial in support of the allegations made by you in your Fourth Amended Counterclaim you filed in this matter.

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SERVICE LIST

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Jack Scarola, Esq.
Searcy Denney Scarola et al.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
JSX@SearcyLaw.com
MEP@SearcyLaw.com

Jack Goldberger, Esq.
Atterbury, Goldberger, & Weiss, PA
250 Australian Ave. South
Suite 1400
West Palm Beach, FL 33401
jgoldberger@agwpa.com

Marc Nurik, Esq.
1 East Broward Blvd.
Suite 700
Fort Lauderdale, FL 33301
marc@nuriklaw.com

Bradley J. Edwards, Esq.
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N Andrews Avenue
Suite 2
Fort Lauderdale, Florida 33301
Staff.efile@pathtojustice.com

Fred Haddad, Esq.
1 Financial Plaza
Suite 2612
Fort Lauderdale, FL 33301
Dee@FredHaddadLaw.com