

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).

PLAINTIFFS' REQUEST FOR PRODUCTION TO JEFFREY EPSTEIN

Defendant/Counterplaintiff, Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff/Counterdefendant, Jeffrey Epstein, produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

1. Any and all documents* reflecting, relating to, or suggesting that Edwards had knowledge about Rothstein's commission of or attempt to commit any fraud prior to the public disclosure of Rothstein's criminal conduct.
2. Any and all documents* which in any way support the claim or claims that Epstein is pursuing against Edwards.
3. All emails that Epstein intends to use or may use as a trial exhibit.
4. All documents* that rebuts, refutes, and/or contradicts the claims Epstein is pursuing against Edwards.

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5. Statements from anyone that in any way support the claims Epstein is pursuing against Edwards.

**"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.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

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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, this 9th day of June, 2011.



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