

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

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

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

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AARON R. BUCK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 4  
FILED

**PLAINTIFF JEFFREY EPSTEIN'S RENEWED MOTION FOR  
PROTECTIVE ORDER RELATING TO HIS DEPOSITION**

Plaintiff Jeffrey Epstein moves the Court for entry of a protective order, pursuant to Florida Rule of Civil Procedure 1.280, to prevent the taking on November 14, 2011 of his further deposition which Defendant Bradley J. Edwards ("Edwards") has noticed over the Plaintiff's objection. The grounds for this Motion are:

1. On or about October 27, 2011, counsel to Edwards noticed the video deposition of the Plaintiff for November 14, 2011 in West Palm Beach, Florida to retake the deposition of the Plaintiff. A copy of the Notice is attached as Exhibit A.
2. The Plaintiff seeks a protective order to prevent his further deposition at this time because (a) he has already been deposed at length; (b) no meaningful grounds have been alleged to justify the taking of a second deposition other than the unsubstantiated assertion that the Plaintiff has somehow waived his rights under the Fifth Amendment to the U.S. Constitution which he has not; (c) the timing is in conflict with the Court's recent order requiring the

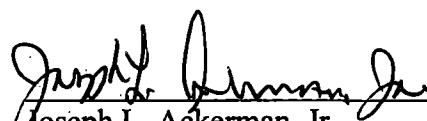
resolution of the pleadings so that the Court may determine the scope of inquiry; and (d) it is burdensome, oppressive, and harassing to allow another deposition.

Moreover, the taking of a video deposition in light of the publicity surrounding these parties would be particularly prejudicial to the Plaintiff, so the Plaintiff requests restrictions on the taking and/or use of a video deposition.

3. Rule 1.280(c) affords the Court discretion to grant protective orders for good cause shown and to protect a party from annoyance, embarrassment, oppression, or undue burden or expense. *See also Logitech Cargo v. JW Perry*, 817 So. 2d 1033 (Fla. 3d DCA 2002). Moreover, the Court may determine the time, place of a deposition, and circumstances of how a deposition can occur. Fla. R. Civ. P. 1.280(c)(2). In this case, the Court should determine whether a further deposition of the Plaintiff is justified or necessary and whether a video deposition should be allowed; and if so, what restrictions should be placed on its use.

WHEREFORE, for the above stated reasons, Plaintiff Jeffrey Epstein moves for entry of a protective order to prevent the taking of his deposition set for November 14, 2011 and for such other relief as the Court deems proper in the circumstances.

Respectfully submitted,

  
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**CERTIFICATE OF SERVICE**

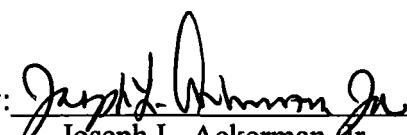
I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via U.S.

Mail on this 28<sup>th</sup> day of October, 2011 to:

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Searcy Denney Scarola Barnhart & Shipley, P.A.  
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By:   
Joseph L. Ackerman, Jr.

#291874/mep

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).

**RE-NOTICE OF TAKING VIDEO DEPOSITION**

TO: All counsel on the attached Counsel List

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

**NAME AND ADDRESS**      **DATE AND TIME**      **LOCATION**

|                 |                                |   |
|-----------------|--------------------------------|---|
| Jeffrey Epstein | November 14, 2011<br>9:00 a.m. | Searcy Denney, et al<br>2139 Palm Beach Lakes<br>Boulevard, WPB |
|-----------------|--------------------------------|---|

VIDEOGRAPHER: To be arranged by Phipps Reporting

upon oral examination before Phipps Reporting, a Notary Public; or any other officer authorized by law to take depositions in the State of Florida. The oral examination is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the applicable Statutes or Rules.

**EXHIBIT**

tabbed

A

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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 27 day of October, 2011.



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Fax: (561) 383-9451  
Attorney for Bradley J. Edwards

cc: Phipps Reporting

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

**AMERICANS WITH DISABILITIES ACT**

In accordance with the Americans With Disabilities Act, persons in need of a special accommodation to participate in this proceeding should contact the Human Resources Manager, Searcy Denney Scarola Barnhart & Shipley, P.A., no later than seven days prior to the proceeding. Please telephone (561) 686-6300.

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