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

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendants/Counter-Plaintiffs.
_____/

RESPONSE TO PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION TO STRIKE DEFENDANT/COUNTER-PLAINTIFF'S DAMAGES EXPERT WITNESS, DR. BERNARD JANSEN, AND TO EXCLUDE HIS TESTIMONY

Counter-Plaintiff, Bradley J. Edwards, by and through undersigned counsel, hereby files this Response to Plaintiff/Counter-Defendant Jeffrey Epstein's Motion to Strike Expert Witness, Dr. Bernard Jansen, and to Exclude His Testimony, and as ground therefore states:

RELEVANT FACTS

After having filed a malicious action against Edwards, Epstein attempts to avoid responsibility by seeking to exclude expert testimony regarding the massive dissemination of the spurious allegations in his lawsuit against Edwards. Dr. Bernard Jansen is a tenured full-time professor at the College of Information Sciences and Technology at the Pennsylvania State University and is the Director of Information Searching and Learning Laboratory at the college (Report, p.24).[1] Dr. Jansen is also the principal scientist at the Qatar Computing Research Institute

[1] This is a reference to Dr. Jansen's report, dated October 20, 2017, which was attached as Exhibit H to Epstein's Motion to Strike. His curriculum vitae was submitted as an exhibit to his deposition on December 1, 2017 (Depo. pp. 4-5)

(Report, p.24). In addition, he has over 20 years of experience in the United States Military dealing with computer science issues (Report, p.76). Dr. Jansen has authored over 250 academic publications focusing in the area of web analytics and related topics (Report, pp.28-39). Most recently, Dr. Jansen was the testifying expert in the highly publicized trial of the sports reporter Erin Andrews's suit against Marriott International, where he was qualified as an expert to analyze the dissemination of the unauthorized video of Ms. Andrews on the Internet (Report, p.77).

Dr. Jansen is highly qualified to render an opinion in this case. The work that he has performed in this case is entirely within his area of expertise, as described above and outlined more fully in his curriculum vitae.

Dr. Jansen was retained to analyze the extent of the dissemination on the Internet of the malicious accusations against Edwards raised in Epstein's lawsuit (Depo, pp. 6-10, 18, Report; pp.3-4). Dr. Jansen limited his work to include information from the date Epstein's lawsuit was filed until the day of his report in October 2017 (Report, p.5). During that time, the primary allegations contained exclusively in Epstein's suit, i.e. that Edwards was involved in Rothstein's criminal conduct, has been included in 74 online media sites in 104 separate stories or articles with a combined 9,669,542 daily visitors (Depo. p.16; Report, p.5). As explained in detail in his report and again in his deposition, Dr. Jansen conducted his web analytic work using the most reliable and conservative approach in the industry (Depo. pp.71-81).

Dr. Jansen explained that it is not possible to look at the traffic to a page for a certain day or to view the readerships of a specific article (Depo., pp.48-49).[2] Dr. Jansen therefore determined average daily traffic to a given site over the period of a week or a month (Depo., 48; Report, p.15).

[2] This is a reference to the transcript of Dr. Jansen's deposition, taken on December 1, 2017, which was attached as Exhibit E to Epstein's Motion to Strike.

These figures are what are used in the industry to determine daily readership of websites (Depo., p.53; Report, p.10).

Dr. Jansen took several measures to ensure his analysis was conservative. For example, he used the lowest number for the unique daily visitor count reported by the web analytic services so that the numbers would not be inflated. His conservative approach also involved examining only on-line sources and not any print or broadcast media that included the information in question (Depo. p.74-76). Dr. Jansen also did not include articles on websites for which he was unable to verify the visitor data to confirm the number of users (Depo. pp. 78-79; Report, p.6). So, out of the 74 sites that contained articles with the language in question, he included the traffic of only 58% in his potential daily visitors total because he could not validate the traffic numbers for the other 42% (Depo. p.78). He did not include numbers for multiple articles published by the same site with different publication dates (Depo. p.80). He also did not include the counts of those people who may have been searching using a site such as Google and saw the allegations in the search results listing (Depo. p.80).

Additionally, Dr. Jansen did not include numbers for any dissemination of Epstein's malicious accusations beyond that of the actual visitors to the site in question. Thus, he did not count any times the articles were emailed or linked to another story not including the language in question here (Depo., p.79-80; Report, p.6), or any face-to face dissemination (Depo., p.78; Report, p.6).

Finally, as to the conservative aspect of Dr. Jansen's search, he did not include dissemination of Epstein's false allegations against Edwards contained in the book *Filthy Rich* by James Patterson and John Connolly (Depo., p.76; Report, p.6). This book was an account of the

rise and fall (so far) of Jeffrey Epstein and includes the allegations raised by Epstein that Edwards was involved in Scott Rothstein's Ponzi scheme.

LEGAL ARGUMENT

A. Basic Standards for Admission of Expert Testimony

Section 90.702, Florida Statutes, dealing with the admission of expert testimony, provides:

> If scientific, technical, or other specialized knowledge will assist the trier of fact in understanding the evidence or in determining a fact in issue, a witness qualified as an expert by knowledge, skill, experience, training, or education may testify about it in the form of an opinion or otherwise, if:
>
> (1) The testimony is based upon sufficient facts or data;
>
> (2) The testimony is the product of reliable principles and methods; and
>
> (3) The witness has applied the principles and methods reliably to the facts of the case.

Here, Epstein argues only that Dr. Jansen's testimony is not relevant to any fact in issue and will not assist the trier of fact in understanding the evidence or in determining a fact in issue.

B. Dr. Jansen's Testimony is Admissible as it will Assist the Jury in Determining Plaintiff's Damages

A claim for malicious prosecution is considered a personal tort. *Cate v. Oldham*, 450 So.2d 224, 227 (Fla. 1984)(citing *Tatum Bros. Real Estate & Inv. Co. v. Watson*, 109 So. 623 (Fla. 1926). "The gravamen of the action is injury to character." *Tatum Bros.*, 109 So. at 227 (citing *Tidwell v. Witherspoon*, 21 Fla. 359, 360–61 (1885)). As Epstein acknowledges (Motion, p.12), damages in a malicious prosecution action include damages to **reputation, shame, humiliation, and mental anguish**. *Tatum Bros. Real Estate & Inv. Co. v. Watson*, 109 So. 623, 626 (Fla. 1926); *Ware v. United States*, 971 F. Supp. 1442, 1471 (M.D. Fla. 1997)(recognizing that "injury to … reputation, shame, humiliation, mental anguish, and hurt feelings flowing from … prosecution" are all damages resulting from malicious prosecution); *see also Tackett Plastics, Inc. v. Bowsmith, Inc.*,

614 So.2d 30, 31 (Fla. 2d DCA 1993)(recognizing that harm to reputation, humiliation, embarrassment, and mental suffering are valid damages in malicious prosecution action); *Turkey Creek, Inc. v. Londono*, 567 So.2d 943, 948 (Fla. 1st DCA 1990), approved, 609 So. 2d 14 (Fla. 1992)(noting that harm to reputation is a valid element of damages for malicious prosecution); *City of Coconut Creek v. Fowler*, 474 So.2d 820, 825 (Fla. 4th DCA 1985)(explaining that a malicious prosecution is "a very ancient remedy" to right a harm to reputation).

Many of these elements of damages in malicious prosecution claims are the same as elements of damages in defamation claims. *See Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 350 (1974); *Boyles v. Mid-Florida Television Corp.*, 431 So. 2d 627, 636 (Fla. 5th DCA 1983), approved, 467 So. 2d 282 (Fla. 1985); *Miami Herald Pub. Co. v. Ane*, 423 So.2d 376, 390 (Fla. 3d DCA 1982), approved, 458 So. 2d 239 (Fla. 1984); *see also* Fla. Stan. Jury Instruct. 405.10 (damages for defamation include injury to reputation, shame, humiliation, mental anguish, and hurt feelings). Thus, the fact that some elements of damages raised here and the evidence used to prove such damages may be the same as in a defamation case, does not support Epstein's' claim that Edwards is disguising an impermissible defamation claim within this malicious prosecution action.

In a malicious prosecution case, the Oklahoma Supreme Court stated (*Browning v. Ray*, 440 P.2d 721, 724 (Okla. 1968)):

> [G]eneral damages for injury to reputation and emotional or mental distress, the precise amount of which by their very nature is almost impossible of proof and which damages almost certainly result if one has been maliciously prosecuted, may be awarded if plaintiff has established the other essential elements of an action for malicious prosecution. **We recognize that the amount of such damages for injury to reputation and for distress will be determined, at least in major part, by the gravity of the offense charged and the publicity given the prosecution of plaintiff.**

See also Shweitzer v. Sanchez, 456 P.2d 882, 884 (N.M. App. 1968) (citing *Browning* for same principle).

Additionally, courts have evaluated the propriety of damage awards in malicious prosecution cases based, in part, on the amount of publicity attendant to the scurrilous charges. *See Colegrove v. City of Corning*, 388 N.Y. S.2d 964 (N.Y.A.D. 1976) (damages for malicious prosecution and false arrest were not excessive based on, inter alia, the "attendant adverse publicity" and its effect on the plaintiff, his wife and his children); *Hardin v. Caldwell*, 695 S.W. 2d 189 (Tenn. App. 1985) (damages awarded in malicious prosecution case not excessive because, inter alia, "the widespread publicity" of the charges); *Zenik v. O'Brian*, 79 A.2d 769 (Conn. 1951) (damages awarded in malicious prosecution case not excessive based on the "widespread publicity" attendant of litigation). In fact, the failure to document the publicity associated with the wrongful litigation can be relied on as a factor to limit the Plaintiff's damages. See *Jones v. Soileau*, 448 So.2d 1268 (La. 1984).

Epstein has not cited a single case holding that the extent of the publicity associated with the wrongful litigation is not a proper element of damages in a malicious prosecution case.

With respect to Dr. Jansen, it is clear he is an expert on the dissemination of information on the internet and he has used his expertise to track the dissemination of the injurious content of Epstein's wrongfully filed lawsuit. As his testimony clearly demonstrated, he focused on the subject matter of the false allegations that Edwards was involved in the criminal activity of Rothstein and the underlying Ponzi scheme. Tracking the dissemination of that information, which emanated from the wrongful lawsuit filed by Epstein, requires an expert given the technical complexities of tracking data on the internet.

The information provided by Dr. Jansen is certainly outside the purview of the typical juror. Evidence requiring technical computer knowledge beyond the expertise of a typical lay juror as to an issue in the case is generally admissible. *See Marten Transp., Ltd. v. Plattform Advert., Inc.,* 184 F. Supp. 3d 1006, 1010 (D. Kan. 2016) (holding that testimony of computer consultant with experience in computer forensics and data recovery offered expertise beyond that of the typical lay juror concerning search techniques, including the use of internet archives, would be helpful to a jury); *Khoday v. Symantec Corp.*, 93 F. Supp. 3d 1067, 1073 (D. Minn. 2015), as amended (Apr. 15, 2015)(holding that testimony of web archive manager admissible because his specialized knowledge of the website archiving and retrieval process would offer assistance to the jury in understanding the issues in the case).

Epstein argues that Dr. Jansen's testimony will not help the trier of fact because he did not testify whether the malicious suit filed against Edwards by Epstein caused Edwards shame, humiliation, mental anguish, and hurt feelings (Motion, p.14). This argument is misplaced. All relevant evidence is admissible. §90.402. Evidence is relevant if it tends to prove or disprove a material fact. §90.401. Here, Dr. Jansen's testimony is relevant to the issue of damages suffered as a result of Epstein's malicious prosecution of Edwards. Because the extent of the dissemination of the false claims made by Epstein bears directly on how much "shame, humiliation, and mental anguish" Edwards has suffered.

Dr. Jansen testified at his deposition that the allegations raised in Epstein's suit against Edwards that he was a participant in Scott Rothstein's Ponzi scheme were disseminated on 74 media sites in 104 different articles. Based upon conservative figures, Dr. Jansen opined that those articles reached at least 9,665,542 people. This testimony establishes the scope of the dissemination of the false and malicious accusations raised against Edwards in Epstein's suit. That

testimony is without a doubt relevant as to whether and to what degree Edwards suffered damages such as harm to reputation, humiliation, and mental anguish.

Dr. Jansen is not attempting to be an expert on monetizing Plaintiff's intangible losses, nor on the causation of Plaintiff's intangible damages. And he does not need to be an expert on those subjects to assist the jury or to present admissible testimony. It is well-settled that the determination of the amount of intangible damages in personal injury tort actions is "peculiarly within the province of the jury." *Bould v. Touchette*, 349 So.2d 1181, 1184 (Fla. 1977). That principle has been specifically applied in Florida to damages in malicious prosecution cases. See *McDonald v. Sport*, 296 So.2d 648 (Fla. 3d DCA 1974); *Maiborne v. Kuntz*, 56 So.2d 720 (Fla. 1952); *Schlesser v. Levinson*, 406 So.2d 1265 (Fla. 4th DCA 1981). Thus, no expert is authorized to testify as to a methodology for monetizing a Plaintiff's intangible damages.

Epstein claims that Dr. Jansen's testimony should be excluded because he could not specifically testify that all the "hits" on the websites which disseminated the critically false information actually demonstrate people who viewed that subject matter. This fact does not make the testimony any less relevant or helpful to a jury. As discussed above, Dr. Jansen used extremely conservative methods establishing the numbers of articles, published, websites hosting, and daily unique visitor traffic. The testimony is relevant to establish the size of readership of the media sites in question. It will certainly be helpful for the jury to understand the scope and the spread of the sites in determining whether Edwards was in fact damaged by dissemination of the relevant articles on the sites. For instance, according to Dr. Jansen, the Palm Beach Daily News has average daily unique traffic of 8,320 visitors and the Miami Herald has average daily traffic of 183,000 visitors. If the jury were to hear that the articles were disseminated only on the Palm Beach Daily News website, on one occasion, it would certainly evaluate Edwards's claim different by than if the

articles were also disseminated in the Palm Beach Post, New York Daily News (1,785,333 unique daily visitors), and Forbes (3,942,600 daily unique visitors).

Additionally, Epstein's argument runs directly into a fundamental principle of jurisprudence that a defendant cannot benefit from his own wrongdoing. In *Bigelow v. RKO Radio Pictures*, 327 U.S. 251, 265 (1946):

> The most elementary conceptions of justice and public policy require that the wrongdoer shall bear the risk of the uncertainty which his own wrong has created. That principle is an ancient one, and is not restricted to proof of damage in antitrust suits. [Citations omitted].

In this case, Epstein maliciously filed a false lawsuit against Edwards accusing him of criminal conduct, racketeering, and participation in a massive Ponzi scheme which Epstein knew was receiving nationwide publicity. As is apparent from the context of his filing the lawsuit, Epstein intended that it would harm Edwards, not only in his reputation but also in the performance of his profession, more particularly his ability to pursue civil actions against Epstein on behalf of Edwards's clients, L.K., E.W., and Jane Doe. Epstein obviously knew, and intended, that Edwards' reputation would suffer from this lawsuit, and that such harm is difficult to remedy and to quantify. He should not be heard now to argue that Edwards' evidence, in this case expert testimony from a highly qualified witness utilizing established methodologies is incompetent to provide the jury guidance in determining the appropriate damages.

The Florida Supreme Court has stated (*McCall v. Sherbill*, 68 So.2d 362, 364 (Fla. 1953)):

> There are many types of cases in which the damages may be certain, but the amount of damage may be uncertain. However, such uncertainty will not necessarily preclude recovery.

More specifically, the Court has recognized that some degree of speculation is inherent in any jury award for intangible damages (*Seaboard Coast Line R. Co. v. McKelvey*, 270 So.2d 705, 706 (Fla. 1972)):

> Quite obviously some speculation enters into most personal injury actions, but the yardstick does not exist which can measure future humiliation, pain and suffering of the injured with sufficient certainty to divest a jury of exercising its sound discretion to determine the damage award based upon the evidence and merits of each case under consideration.

Dr. Jansen's testimony provides a valuable aid to the jury in assessing the scope of dissemination of Epstein's false charges. Thus, while some degree of speculation is inherent in any jury award of intangible damages, that is not a basis to exclude his testimony.

Epstein acknowledges that the trial court has "wide discretion" in determining which matters are proper subjects of expert opinion testimony, citing *Bryant v. Buerman*, 739 So.2d 710, 712 (Fla. 4th DCA 1999) (Motion, p.15). Epstein does not dispute that Dr. Jansen has a recognized expertise that he applied in analyzing the dissemination of the gravamen of Epstein's malicious lawsuit. As such, Epstein does not provide a basis to demonstrate that this Court is compelled, prior to trial, to exclude Dr. Jansen's testimony. He has also cited no comparable case in which the exclusion of such testimony occurred. Epstein's criticisms of the limited nature of Dr. Jansen's testimony can be raised during cross-examination of the expert because they go the weight of the testimony, not admissibility. *See Florida Dept. of Transp. v. Armadillo Partners, Inc.*, 849 So. 2d 279 (Fla. 2003)

The definition of relevant evidence is evidence tending to prove or disprove a material fact. §§90.401, 90.402, Fla. Stat. Here, Dr. Jansen's testimony tends to prove that the false gravamen of Epstein's suit against Edwards was widely disseminated throughout the internet to multiple websites which were viewed by millions of people during the relevant time period. As noted previously, the extent of the publicity of the scurrilous lawsuit is a relevant consideration in determining the Plaintiff's damages. This is true not only for the intangible losses associated with

reputational damage, but also the shame and humiliation experienced by the Plaintiff in being subjected to that adverse publicity which had no foundation in fact.

Epstein does not cite any particular principle of admissibility that justifies exclusion of Dr. Jansen's testimony. Instead, he criticizes Dr. Jansen for issues he did not address such as causation and the monetization of Plaintiff's intangible damages. However, that is frankly irrelevant to this Court's determination. The question is whether Dr. Jansen's testimony is helpful to the jury in determining the extent of the dissemination of the critical subject matter of Epstein's lawsuit against Edwards. Clearly, Dr. Jansen's testimony will be helpful to the jury in evaluating the damage to the Plaintiff by defining the scope of the internet dissemination of Epstein's false charges. That is information that a layperson would not be qualified to access and, of course, would not be permitted to investigate themselves as members of the jury. *See* Fla.Std.Civ.Jur.Ins. 2012.

In *Angrand v. Key*, 657 So.2d 1146 (Fla. 1995), the Florida Supreme Court authorized the admission of testimony of psychiatrist, psychologist, or other qualified professionals on the issue of the pain and suffering caused by the death of a survivor's decedent. In that situation, the expert obviously was not monetizing the loss, yet it was deemed helpful and admissible to assist the jury in evaluating the intangible losses.

In *Acree v. Hartford South Inc.*, 724 So.2d 183 (Fla. 5th DCA 1999), the court authorized the admission of testimony of an expert on human perception, regarding how an average alert driver could fail to see two people who ran in front of his truck. In that case, the expert could not specifically testify as to causation of the accident at issue, nor testify as to the particular perceptions or conduct of the defendant. Nonetheless, that testimony was deemed helpful to the jury in evaluating the issues before it.

C. Epstein's Irrelevant Arguments

This is not a defamation action. Epstein refuses to accept what has already been established in this case: Edwards has stated a valid cause of action for malicious prosecution. Epstein's repeated claims that Edwards is actually improperly pursuing a defamation claim must be rejected once again. Although some of the elements of damages of a malicious prosecution claim may be the same as those that may arise in a defamation claim, that does not convert the cause of action into a defamation case. Loss of reputation, shame and humiliation are valid damages caused by the distinct effect of a malicious prosecution just as they are in a defamation action.

Epstein's Motion quotes from pleadings and discovery and suggests that because the word "defamation" or the phrase "defamatory per se" were utilized at various times, that this must be a defamation action. There is no logic to that contention. Defamation is a generic term as indicated from the following definition in the Merriam Webster dictionary: "the act of communicating false statements about a person that injur the reputation of that person." Similarly, "defamatory per se" while certainly having particular application in defamation cases, is also generically defined as "a statement that is defamatory in of itself and is not capable of an innocent meaning." (Black's Law Dictionary 9th Ed. p.480).

One of the essential elements of a malicious prosecution claim is that the allegations in the wrongfully filed lawsuit against the plaintiff be without merit and that there was an absence of probable cause for alleging them. Obviously, that means that there must be false material contained within the charging document that is disproved (or abandoned) in the underlying case, resulting in a bona fide termination in favor of the plaintiff. As noted above, the damages available in a malicious prosecution action include the damages to the plaintiff's reputation, and the shame and humiliation caused by the false charges. Thus, false statements are an inherent part of any

malicious prosecution case and the impact of those charges and their dissemination are directly linked to the issue of damages.

Epstein contends that a malicious prosecution action focuses on the civil proceeding and not "handpicked allegations," which is irrelevant to Dr. Jansen's testimony. Dr. Jansen's work involved tracking the dissemination of the critical subject matter of Epstein's malicious lawsuit, i.e. that Edwards was involved in the criminal conduct masterminded and implemented by Rothstein. That cannot be characterized as a "handpicked allegation," but rather was the gravamen of Epstein's scurrilous lawsuit which damaged Edwards. Therefore, the Court should ignore that irrelevant argument.

Epstein's motion makes many arguments that have no application to the admissibility of Dr. Jansen's testimony. These include taking issue with an allegation in Epstein's complaint that Edwards knew or should have known that the three civil actions he filed against Epstein were "weak." Dr. Jansen did not do any search of the internet regarding the subject matter of the three civil cases brought against Epstein for sexual molestation and whether they were weak. Thus, this subject has no place in this motion which challenges Dr. Jansen's testimony, and therefore it should be ignored.

Epstein also falsely claims that Edwards has admitted to having "no reputational damage" (Motion, p.7), relying primarily on statements that Edwards has worked hard subsequent to the filing of Epstein's malicious lawsuit in 2009 to "resurrect" his reputation among those in the local community who know him. That is not the equivalent of an admission of no reputational damages, nor is the fact that Edwards is not seeking economic damages for lost income. As noted previously, extensive case law in Florida holds that a plaintiff in a malicious prosecution action is entitled to recover intangible damages for the loss of reputation, as well as the shame and humiliation suffered

as a result of the maliciously prosecuted litigation. Moreover, that issue is entirely independent of the admissibility of Dr. Jansen's testimony.

Finally, Epstein resurrects his contention that the litigation privilege applies. However, the Fourth District ruled against him as a matter of law and he conceded in the Florida Supreme Court that its decision in *Debrincat v. Fischer*, 217 So.3d 68 (Fla. 2017), resolved that issue. As a result, that determination is law of the case. Moreover, that issue has no logical relationship to the admissibility of Dr. Jansen's testimony.

CONCLUSION

Epstein has set forth no valid reason for excluding the expert testimony of Dr. Jansen. The jury should have the benefit of hearing Dr. Jansen's testimony on the mass dissemination of the malicious claims Epstein raised against Edwards.

For the reasons discussed above, Epstein's Motion to Strike Expert Witness, Dr. Bernard Jansen, and to Exclude His Testimony must be denied.

I HEREBY CERTIFY that a true copy of the foregoing was furnished to all counsel on the attached service list, by email, on January 29, 2018.

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