

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

Case No. 502009CA040800XXXXMBAG

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN'S MOTION  
TO ENLARGE TIME TO RESPOND TO CERTAIN DISCOVERY REQUESTS**

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 Certain Discovery Requests. The grounds for this motion are as follows:

1. On September 16, 2010, the Defendant/Counter-Plaintiff, Bradley Edwards served by facsimile the following discovery requests on counsel for Epstein:

1. A Request to Produce;
2. Expert Interrogatories and Request to Produce;
3. General Interrogatories;
4. Request for Admission with an Interrogatory.

2. The deadline for the responses to the discovery requests is October 18, 2010.

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. For most of the thirty (30) day period that Epstein has had to respond to these interrogatories, Epstein has been out of the state.

6. Epstein has also objected to the number of requests for admission because among other reasons, the number, including subparts, exceeds the limit of thirty (30) provided by the Florida Rules of Civil Procedure.

7. Epstein requests an extension of fourteen (14) days within which to serve responses to the discovery for which no objection has been offered.

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 November 1, 2010 in which to serve a response to the discovery requests to which no objection has been lodged.

#### **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 18<sup>th</sup> day of October, 2010 to:

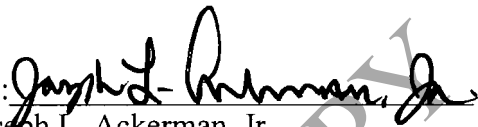
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