

IN THE CIRCUIT COURT OF THE 15<sup>th</sup> JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

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FILED  
2011 DEC -5 PM 2:54  
SHARON R. BOCK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 3

**RENEWED MOTION FOR ORDER TO TAKE SCOTT ROTHSTEIN'S DEPOSITION**

Plaintiff, JEFFREY EPSTEIN, by and through undersigned counsel, hereby files his Renewed Motion for Order to take the deposition of Defendant, SCOTT ROTHSTEIN (hereinafter "ROTHSTEIN") and states as grounds the following:

1. Plaintiff is seeking to take the deposition of SCOTT ROTHSTEIN in the above-styled litigation.
2. ROTHSTEIN is a party to this matter and therefore, Plaintiff is entitled to take his deposition in accordance with Rule 1.310 of the Florida Rules of Civil Procedures.
3. To the knowledge of the Plaintiff, ROTHSTEIN is currently incarcerated within the U.S. Department of Justice Federal Bureau of Prisons and is in protective custody.
4. The Federal Bureau of Prisons and the United States Bankruptcy Court for the Southern District of Florida require an Order entered by this Court to allow Plaintiff to take the deposition of ROTHSTEIN at the location where he is currently incarcerated.

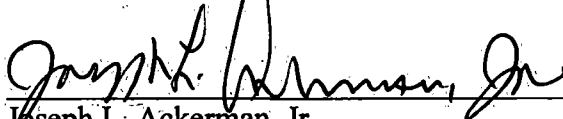
Epstein v. Rothstein and Edwards  
Case No. 502009CA040800XXXXMB/Div. AG  
Renewed Motion for Order to Take Scott Rothstein's Deposition

5. Plaintiff believes that ROTHSTEIN has specific information that is crucial to the prosecution of his case.

WHEREFORE, Plaintiff respectfully requests this Court enter an Order granting Plaintiff's Renewed Motion for Order to Take Scott Rothstein's Deposition in accordance with Rule 1.310 of the Florida Rules of Civil Procedure.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail and U.S. Mail on this 2<sup>nd</sup> day of December, 2011 to: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Blvd., West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Blvd., Suite 700, Fort Lauderdale, FL 33301.

  
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Joseph L. Ackerman, Jr.  
Florida Bar No. 235954

FOWLER WHITE BURNETT, P.A.  
901 Phillips Point West  
777 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone: (561) 802-9044  
Facsimile: (561) 802-9976  
*Counsel for Plaintiff Jeffrey Epstein*