

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

\_\_\_\_\_ /

**MOTION TO EXPAND INTERROGATORIES**

Bradley J. Edwards, by and through the undersigned counsel, moves this Honorable Court pursuant to the provisions of Rule 1.340(a), Florida Rules of Civil Procedure, to increase the number of initial interrogatories permitted herein so as to allow for the filing of two sets of additional interrogatories in accordance with those attached, and in support of this motion, Bradley J. Edwards would show:

1. The Supreme Court has not approved a form of interrogatories for this type of action.
2. The elements of the claims asserted and the nature and complexity of the factual circumstances giving rise to the claims are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.
3. The elements of defenses asserted or expected to be asserted are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit. Two sets of additional interrogatories are attached.

4. The use of written interrogatories is the least burdensome, least expensive and most expeditious discovery means available to the Defendant by which to obtain necessary information and narrow trial issues.

5. The Plaintiff will not be prejudiced through the granting of this motion.

6. The foregoing factors and others to be presented upon hearing of this Motion constitute good cause for increasing the number of interrogatories permitted herein.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all counsel on the attached list, this 25<sup>th</sup> day of May, 2017.



Jack Scarola  
Florida Bar No.: 169440  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: (561) 686-6300  
Fax: (561) 383-9451  
Attorneys for Defendant

**COUNSEL LIST**

William Chester Brewer, Esquire  
wcblaw@aol.com; wcblawasst@gmail.com  
250 S Australian Avenue, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-655-4777  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Jack A. Goldberger, Esquire  
jgoldberger@agwpa.com;  
smahoney@agwpa.com  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue S, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire  
staff.efile@pathtojjustice.com  
Farmer Jaffe Weissing Edwards Fistos &  
Lehrman, P.L.  
425 N Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954)-524-2820  
Fax: (954)-524-2822

Fred Haddad, Esquire  
Dee@FredHaddadLaw.com;  
Fred@FredHaddadLaw.com  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: (954)-467-6767  
Fax: (954)-467-3599  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire  
tonja@tonjahaddad.com;  
efiling@tonjahaddad.com  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: (954)-467-1223  
Fax: (954)-337-3716  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire  
marc@nuriklaw.com  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954)-745-5849  
Fax: (954)-745-3556  
Attorneys for Scott Rothstein

**FACT WITNESS INTERROGATORIES TO JEFFREY EPSTEIN**

As to every individual identified on Jeffrey Epstein's List of Trial Witnesses, state the following:

1. Each contested factual issue expected to be addressed by the witness;

ANSWER:

2. A detailed description of the testimony expected to be presented at trial by the witness as to each contested factual issue;

ANSWER:

3. A description of the Trial Exhibit List number of each exhibit expected to be introduced into evidence by the witness;

ANSWER:

4. A description of the Trial Exhibit List number of each exhibit introduced through other means which the witness is expected to testify about, together with a description of the witness' expected testimony regarding each exhibit;

ANSWER:

STATE OF \_\_\_\_\_)

COUNTY OF \_\_\_\_\_)

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by \_\_\_\_\_, who is personally known to me or who has produced \_\_\_\_\_ as identification and who did/did not take an oath.

(SEAL)

\_\_\_\_\_  
(Notary signature)

\_\_\_\_\_  
(Notary name - print)  
NOTARY PUBLIC, State of Florida

\_\_\_\_\_  
(Serial number, if any)

NOT A CERTIFIED COPY

**NET WORTH INTERROGATORIES TO JEFFREY EPSTEIN**

1. What is your full name?

2. How are you currently employed?

3. State the amount of your current salary and describe all additional benefits of employment including bonuses, allowances, pension and profit sharing participations, stock options, deferred compensation, insurance benefits and other prerequisites of your employment including the dollar amount or dollar value of each during the twelve months preceding your receipt of these interrogatories.

4. If you own or have any beneficial interest in any stocks, bonds, mutual funds, or other securities of any class in any government, governmental organization, company, firm or corporation, whether foreign or domestic, please state:

(a) The name and address of the entity in which you own or have any beneficial propriety or security interest of any sort;

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

(b) The serial number of each bond, share, stock certificate or other evidence of ownership or security;

(c) The current fair market value of each such interest;

(d) The manner in which such value was calculated.

5. As to each federal income tax return filed by you or on your behalf for the years 2011 through and including 2016, identify as specifically as identified in your tax return the source of all reported income and the separate amounts derived from each source

6. For each parcel of real property in which you hold any interest, state:

(a) The address,



- (b) The legal description of the property;
- (c) The assessed value of the property for tax purposes;
- (d) The date and price of acquisition;
- (e) Whether, when, and at what amount the property has been appraised since the time of purchase;
- (f) Whether, when, and at what price the property has been offered for sale since the time of purchase;

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

- (g) The name and address of each real estate agent with whom the property has been listed for sale since the time of purchase;
- (h) The cost of any improvements made to the property since purchase;
- (i) The nature of your interest in the property.

7. List each item and state the estimated value of all personal property in which you have an interest which personal property was acquired at a cost in excess of \$5,000 or which personal property has an estimated present value in excess of \$5,000, and as to each state:

- (a) The date of acquisition;
- (b) The cost of acquisition;

(c) The current estimated fair market value;

(d) The manner in which the fair market value was estimated.

8. If any of the real or personal property owned by you, either individually, jointly or otherwise, is encumbered by either a real estate mortgage, chattel mortgage, or any other type of lien, then for each item of property, state a description of the nature and amount of the encumbrance, the date the encumbrance arose, whether the encumbrance is evidenced by any written document and, if so, a description of that document.

9. If you have an ownership interest in any businesses, for each business state:

(a) The name and address of the business;

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

- (b) The present book value and the present market value of your interest in the business, and its percentage of the total value of the business;
- (c) A description of the manner in which the stated fair market value was calculated.

10. Identify all banks, credit union and savings and loan accounts, in which you have an interest or right of withdrawal and for each account state:

- (a) Where the account is located;
- (b) The highest and lowest balance in the account during the 40 day period immediately preceding your receipt of these interrogatories.

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

11. Identify all other assets of a value in excess of \$5,000 which assets were not previously identified and as to each state:

(a) The date of acquisition;

(b) The cost of acquisition;

(c) The current estimated fair market value;

(d) The means utilized to estimate the current fair market value.

12. Identify all other liabilities not previously identified and as to each state:

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

(a) The date the liability arose;

(b) The amount of the liability at inception;

(c) The terms of repayment or satisfaction;

(d) The current outstanding balance.

13. State your year end net worth for each of the past 5 years and your best estimate of your present net worth.

---

Case No.: 502009CA040800XXXXMBAG  
Notice of Serving Net Worth Interrogatories

STATE OF \_\_\_\_\_)

COUNTY OF \_\_\_\_\_)

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by \_\_\_\_\_, who is personally known to me or who has produced \_\_\_\_\_ as identification and who did did/ not take an oath.

(SEAL)

\_\_\_\_\_  
(Notary signature)

\_\_\_\_\_  
(Notary name - print)  
NOTARY PUBLIC, State of Florida

\_\_\_\_\_  
(Serial number, if any)