

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).

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MOTION TO COMPEL DISCLOSURE REGARDING FEE CLAIM

Bradley J. Edwards, by and through his undersigned, moves this Honorable Court to compel the disclosure of the amount and basis for the Counter-Defendant, Epstein's claim for fees and in support would show:

1. Epstein claims fees pursuant to the rejection by Edwards of Epstein's proposal for settlement and the subsequent entry of Summary Judgment in favor of Epstein.
2. The Court has ordered mediation in this matter to encompass all issues between the parties including Epstein's claim for fees which has been stated to exceed a million dollars.
3. Epstein has retained Attorney Jay White as his expert regarding fees, and has had months in which to prepare his case in support of his fee claim which until recently had been scheduled on the Court's current trial calendar.
4. Edwards has made repeated efforts over an extended period of time to obtain discovery regarding the fee claim including either a report from or deposition of Jay White, but

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Epstein has refused to provide this discovery. As a consequence, Edwards has no knowledge of the amount of the fee claim or the manner in which it is intended to be calculated.

Wherefore, Edwards requests entry of an order requiring Epstein to either provide a detailed expert witness report from Jay White, to produce White for deposition, or to strike Epstein's claim for fees.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 31st day of July, 2015.



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