

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT'S OBJECTIONS TO DEFENDANT/
COUNTER-PLAINTIFF'S SECOND AMENDED EXHIBIT LIST**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his Objections to Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") Second Amended Exhibit List dated December 7, 2017, and states:

PRELIMINARY STATEMENT

On November 9, 2017, Edwards filed his Amended Exhibit List identifying 142 exhibits. (D.E. 1043.) On November 15, 2017, Epstein filed his Objections to Edwards' exhibits. (D.E. 1058.) In addition, on November 17, 2017, Epstein filed his Revised Omnibus Motion in Limine which, in part, addressed those objections. (D.E. 1070.) The Court heard extensive arguments on Epstein's objections at special set hearings on November 29, 2017, and December 5, 2017, and made rulings on those objections. While, to date, an Order has not been entered memorializing those rulings, Epstein incorporates them herein.

On December 7, 2017, Edwards filed a Second Amended Exhibit List identifying 218 exhibits, which modified some of his earlier disclosed exhibits and identified 79 new items.¹ (D.E. 1109.) At no time during the special set hearings did Edwards' counsel advise the Court that he intended to amend the Exhibit List or that the parties and Court were working from an incorrect list.

Epstein will be filing a renewed Motion in Limine to address Edwards' newly disclosed exhibits. For ease of reference, Epstein has highlighted the changes and new items identified.

OBJECTIONS

LEGEND FOR OBJECTIONS:

- 1 – All Objections
- 2 – All Objections except Authenticity
- 3 - Relevance
- 4 – Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence
- 5 – Privileged
- 6 - Opinion
- 7 – Hearsay
- 8 – Authenticity
- 9 – Other (please identify basis of objection)
- 10 – Completeness
- 11 – Overbroad
- 12 – Not provided to Counsel for Epstein Prior to Filing Pretrial Stipulation
- 13 – Not a proper exhibit
- 14 – Trade secrets/Confidential

No.	Edwards' Exhibit Description	Epstein's Objections
1.	All applicable criminal statutes	3, 4, 7, 11, 12
2.	All applicable Florida Statutes	3, 4, 7, 11, 12
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12

¹ While Edwards produced many of the new exhibits on November 9, 2017, he never identified them as trial exhibits on his Exhibit List and Epstein was not aware that he intended to rely on them at trial at the time of filing his Omnibus Motion in Limine.

No.	Edwards' Exhibit Description	Epstein's Objections
4.	Order confirmation from <u>Amazon.com</u> for purchase of books "SM 101: A realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"	3, 4, 7, 8
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10
6.	Jane Doe 102 Complaint	3, 4, 7, 13
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11 14
12.	Jail Visitation Logs	3, 4, 7, 8, 11
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8
16.	<u>Video of Epstein Property Inspection!</u> 01/18/10	3, 4, 8
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8, Cannot be read
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")
19.	All records of homes, properties, bank accounts and any/all records related to Jeffrey Epstein's assets	12
20.	Jeffrey Epstein's passport (or copy)	12
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12

No.	Edwards' Exhibit Description	Epstein's Objections
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (from Palm Beach State Attorney's File, Exhibit #29)	3, 4, 7, 8, 10,
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation	3, 4, 7, 8, 10, 11, 14
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12
32.	List of properties and vehicles in Larry Visoski's name	3, 4, 7, 8, 11, 13, The exhibit provided was an entire Motion (which was denied) not just the identified item.
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13
36.	All Complaints in which Jeffrey Epstein is/was defendant	3, 4, 11, 12, 13. This also includes a motion which is not part of the stated exhibit.
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB	3, 4, 11, 12, 13
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG	3, 4, 11, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR) 07/09/2008	3, 4, 7, 8, 14
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant	3, 4, 7, 8, 12
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)	3, 4, 7, 8
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)	3, 4, 7, 8
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13
77.	Documents related to the rental of a vehicle for Vanessa Zalis	3, 4, 7, 8, document produced contains other items not identified on list
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10

No.	Edwards' Exhibit Description	Epstein's Objections
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11
91.	Jeffrey Epstein notepad notes. <u>re</u> Maria	3, 4, 7, 8, 10, 12
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10
96.	Victim's school records and transcripts	3, 4, 7, 8
97.	Victim Notification letter to Virginia Roberts, 09/03/08	3, 4, 7, 8
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts	3, 4, 7, 8, 12 (items not provided)
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto	3, 4, 7, 8, 12, 13
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause	3, 4, 7, 8, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits	12
109.	Edwards reserves all objections to Epstein's Exhibits	Not an exhibit
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.	3, 4, 7, 8, 12, 13
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez	3, 4, 7, 8, 11, 14 (duplicative of Exhibit No. 8)
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009	
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13

No.	Edwards' Exhibit Description	Epstein's Objections
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013	3, 4, 7, 13
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012	
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8
133.	Medical Records: New York Presbyterian Hospital re: Virginia Giuffre, 2001	3, 4, 6, 7, 8, 10
134.	Hand Drawing of Bart Simpson (signed by Matt Groening).	3, 4, 7, 8
135.	Proposed Joint Letter to the Special Master	3, 4, 6, 7, 8
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).	3, 4, 7, 8
137.	Color photo of Virginia Roberts on ferry "New York"	3, 4, 7, 8
138.	Scenic photo of Time Square	3, 4, 7, 8
139.	Virginia Roberts photo on back of ship	3, 4, 7, 8
140.	Picture of room in New York	3, 4, 7, 8
141.	Color photo of man on horse (New Mexico Ranch)	3, 4, 7, 8
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch)	3, 4, 7, 8
143.	Virginia Roberts photo on horse front of ranch	3, 4, 7, 8
144.	Virginia Roberts photo standing against rocks (red coat)	3, 4, 7, 8
145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date).	3, 4, 7, 8
146.	Virginia Roberts photo riding horse blue jacket far	3, 4, 7, 8
147.	Virginia Roberts photo on side of horse hand up	3, 4, 7, 8
148.	Virginia Roberts photo on side of horse	3, 4, 7, 8
149.	Virginia Roberts photo outside next to tables	3, 4, 7, 8
150.	Virginia Roberts photo red coat leaning on rail	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
151.	<u>Virginia Roberts photo standing outside next to fireplace</u>	<u>3, 4, 7, 8</u>
152.	<u>Virginia Roberts photo standing in front of ranch</u>	<u>3, 4, 7, 8</u>
153.	<u>Virginia Roberts photo with hand over head(black/white)</u>	<u>3, 4, 7, 8</u>
154.	<u>Virginia Roberts photo standing next to piano</u>	<u>3, 4, 7, 8</u>
155.	<u>Virginia Roberts photo in front of fireplace(museum)</u>	<u>3, 4, 7, 8</u>
156.	<u>Virginia Roberts photo in front of wagon in museum</u>	<u>3, 4, 7, 8</u>
157.	<u>Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico)</u>	<u>3, 4, 7, 8</u>
158.	<u>Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building!</u>	<u>3, 4, 7, 8</u>
159.	<u>Virginia Roberts (Australia Storage): Photo Book 2</u>	<u>3, 4, 7, 8</u>
160.	<u>Cover photo book 2</u>	<u>3, 4, 7, 8</u>
161.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
162.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
163.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
164.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
165.	<u>Virginia Roberts steps with trees overhead</u>	<u>3, 4, 7, 8</u>
166.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
167.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
168.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
169.	<u>Scenic photo (with back photo white)</u>	<u>3, 4, 7, 8</u>
170.	<u>Scenic photo (with back photo white and black)</u>	<u>3, 4, 7, 8</u>
171.	<u>Scenic photo (with back photo white and black)</u>	<u>3, 4, 7, 8</u>
172.	<u>Scenic photo (with back photo white and black)</u>	<u>3, 4, 7, 8</u>
173.	<u>Virginia Roberts on steps with children (with back photo white and black)</u>	<u>3, 4, 7, 8</u>
174.	<u>Virginia Roberts on street white wall (far) (with back photo white and black)</u>	<u>3, 4, 7, 8</u>
175.	<u>Travel envelope</u>	<u>3, 4, 7, 8</u>
176.	<u>Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts</u>	<u>3, 4, 7, 8</u>

No.	Edwards' Exhibit Description	Epstein's Objections
177.	<u>Thailand Hotel Receipts</u>	<u>3, 4, 7, 8</u>
178.	<u>Court Docket for Jane Doe No. 102 v. Epstein</u>	<u>3, 4, 7, 8, 13</u>
179.	<u>Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein</u>	<u>3, 4, 7, 8, 10</u>
180.	<u>Ghislaine Maxwell deposition, 04/22/16</u>	<u>3, 4, 7, 8, 14</u>
181.	<u>FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11</u>	<u>3, 4, 7, 8, 10</u>
182.	<u>Mark Epstein Deposition</u>	<u>3, 4, 7, 8</u>
183.	<u>March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File)</u>	<u>3, 4, 7, 8, 10</u>
184.	<u>Color photos of Ghislaine Maxwell, one with Jeffrey Epstein</u>	<u>3, 4, 7, 8</u>
185.	<u>Airport Codes (Demonstrative)</u>	<u>3, 7, 8, 10</u>
186.	<u>March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!</u>	<u>3, 4, 7, 8</u>
187.	<u>DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1</u>	<u>3, 4, 7, 8, 12 (only photo of DVDs provided)</u>
188.	<u>[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05</u>	<u>3, 4, 7, 8, 10</u>
189.	<u>Palm Beach Police Investigation; Palm Beach PD Records; Wachovia Bank Account</u>	<u>3, 4, 7, 8, 10, 11</u>
190.	<u>Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files)</u>	<u>3, 4, 7, 8, 10, 11</u>
191.	<u>Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005</u>	<u>3, 4, 7, 8, 10, 11</u>
192.	<u>Folder titled Sara Kellen: AT&T February 12, 2005 Statement</u>	<u>3, 4, 7, 8, 10, 11</u>
193.	<u>Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez</u>	<u>3, 4, 7, 8, 10, 14</u>
194.	<u>Santa Monica Police Report (May 12, 1997)</u>	<u>3, 4, 7, 8</u>
195.	<u>Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein</u>	<u>3, 4, 7, 8</u>
196.	<u>Palm Beach House/Information Sheet</u>	<u>3, 4, 7, 8</u>
197.	<u>Sworn Statement of Juan Alessi taken by Palm Beach Police Department</u>	<u>3, 4, 7, 8</u>
198.	<u>Juan Alessi Deposition (Vol. I) 09/08/09</u>	<u>3, 4, 7, 8</u>

No.	Edwards' Exhibit Description	Epstein's Objections
199.	<u>Juan Alessi Deposition (Vol II) 09/08/09</u>	<u>3, 4, 7, 8</u>
200.	<u>Brochure for Boeing Super 727-100</u>	<u>3, 4</u>
201.	<u>Passport application; issued January 12, 2001</u>	<u>3, 4, 7, 8, 10</u>
202.	<u>Sentencing Transcript, Alfredo Rodriguez</u>	<u>3, 4, 6, 7</u>
203.	<u>Criminal Complaint — Alfredo Rodriguez</u>	<u>3, 4, 6, 7</u>
204.	<u>Plea Agreement — Alfredo Rodriguez</u>	<u>3, 4, 7, 8</u>
205.	<u>Photos of Jeffrey Epstein's properties and planes</u>	<u>3, 4, 7, 8, 10</u>
206.	<u>Photos of Jeffrey Epstein employees and former employees</u>	<u>3, 4, 7, 8, 10</u>
207.	<u>Jeffrey Epstein Guilty Plea documents</u>	<u>3, 4</u>
208.	<u>Palm Beach County State Attorney's Response to Public Records Request (including audio recordings)</u>	<u>3, 4, 6, 7, 8, 10, 11, 13</u>
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition	3, 4, 6, 7, 8, 10, 11, 12, 13, 14
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12, 13
211.	Any and all documents produced in this action.	12
212.	Any and all depositions taken in this action.	12, 13
213.	Any documents or other exhibit attached to or used during any deposition in this action	12, 13
214.	Any and all exhibits, documents, etc. referred to in any deposition	12, 13
215.	Any and all documents and exhibits designated by all parties to this action.	12, 13
216.	Any and all exhibits needed for impeachment or rebuttal	12
217.	Any and all pleadings filed in this action	12, 13
218.	Any and all records produced or that will be produced by all records custodians relative to this action	12, 13

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
West Palm Beach, Florida 33401
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

Scott J. Link (FBN 602991)
Kara Berard Rockenbach (FBN 44903)
Angela M. Many (FBN 26680)
Primary: Scott@linkrocklaw.com
Primary: Kara@linkrocklaw.com
Primary: Angela@linkrocklaw.com
Secondary: Tina@linkrocklaw.com
Secondary: Troy@linkrocklaw.com
Secondary: Tanya@linkrocklaw.com
Secondary: Eservice@linkrocklaw.com

*Trial Counsel for Plaintiff/Counter-Defendant
Jeffrey Epstein*

SERVICE LIST

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart & Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 mep@searcylaw.com jsx@searcylaw.com scarolateam@searcylaw.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington & Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 njs@FLAppellateLaw.com ktb@FLAppellateLaw.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	