

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,
vs.

Case No. 50 2009 CA 040800XXXXMBAG

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

Defendant/Counter-Plaintiff.

/

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION TO QUASH
SUBPOENAS DUCES TECUM AND FOR SANCTIONS**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rules 1.351 and Rule 1.401 of the *Florida Rules of Civil Procedure*, hereby files this Motion to Quash Defendant/Counter-Plaintiff Bradley Edwards's ("Edwards") improperly and impermissibly served Subpoenas *Duces Tecum* and for sanctions, and states:

INTRODUCTION

On September 11, 2013, Edwards served upon Epstein "Subpoenas Duces Tecum Without Deposition" for following non-party individuals; all of whom are Epstein's former counsels: Darren Indyke, Esq., Roy Black, Esq., Christopher Knight, Esq., Robert Critton, Esq., Joseph L. Ackerman, Jr., Esq., Alan Dershowitz, Esq., and Jack Goldberger, Esq. True and correct copies of these subpoenas are attached hereto as composite "Exhibit A." While there was not a proper Notice of Production from Non-Party as required by Rule 1.351(b) of the *Florida Rules of Civil Procedure*, Epstein acted in accordance with Rule 1.351 and timely filed a Notice of Objection to the Subpoenas on September 19, 2013. A true and correct copy of same is attached hereto as "Exhibit B." On September 20, 2013, Epstein became aware that Edwards

had impermissibly served these “Subpoenas Duces Tecum Without Deposition” upon the attorneys simultaneously with serving the copies of the Subpoenas on Epstein. On September 21, 2013 Epstein was also informed that Edwards served one of Epstein’s former attorneys with a Subpoena Duces Tecum without Deposition for whom a copy was never even sent to Epstein (Lilly Sanchez). Accordingly, Epstein requests that this Court quash the subpoenas, preclude Edwards from seeking discovery from Epstein’s former counsels on the eve of trial, and award attorneys’ fees and costs as sanctions for Edwards’s flagrant disregard for the Rules.

MEMORANDUM OF LAW

Epstein’s former attorneys are irrefutably not parties to this action. As such, Rule 1.351 of the *Florida Rules of Civil Procedure* governs. Rule 1.351 provides:

A party desiring production under this rule shall serve notice as provided in rule 1.080 on every other party of the intent to serve a subpoena under this rule at least 10 days before the subpoena is issued if service is by delivery and 15 days before the subpoena is issued if the service is by mail or e-mail. The proposed subpoena shall be attached to the notice and shall state the time, place, and method for production of the documents or things, and the name and address of the person who is to produce the documents or things, if known, and if not known, a general description sufficient to identify the person or the particular class or group to which the person belongs; shall include a designation of the items to be produced; and shall state that the person who will be asked to produce the documents or things has the right to object to the production under this rule and that the person will not be required to surrender the documents or things. A copy of the notice and proposed subpoena shall not be furnished to the person upon whom the subpoena is to be served. If any party serves an objection to production under this rule within 10 days of service of the notice, the documents or things shall not be produced pending resolution of the objection in accordance with subdivision (d).

Fla. R.Civ. P 1.351 (2013). Here, Epstein filed a timely objection to the subpoenas as delineated by the Rule. Conversely Edwards, in flagrant disregard for this Rule, failed not only to provide the requisite notice, but also immediately and impermissibly served these subpoenas upon Epstein’s former attorneys, forcing Epstein to file this Motion. Edwards’s actions mandate that

this Court quash the subpoenas, prohibit Edwards from seeking the information requested in the improper subpoenas, and award Epstein his costs and fees incurred in responding to Edwards's impermissible tactics.

Epstein's timely objection to the subpoenas *duces tecum* would have been self-executing and would not have required Epstein to incur the additional costs and fees associated with responding to Edwards's disregard of procedure. *See ABC Liquors, Inc. v. Berkey*, 589 So. 2d 457, 458 (Fla. 5th DCA 1991); *see also* Rule 1.351(c) ("If the person upon whom the subpoena is served objects at any time before the production of the documents or things, the documents or things shall not be produced under this rule, and relief may be obtained pursuant to [the rule governing depositions]."). *Morgan, Colling & Gilbert, P.A. v. Pope*, 756 So. 2d 201, 201 (Fla. 2d DCA 2000). However, because Edwards impermissibly served these subpoenas upon Epstein's former counsel, he must seek redress from the Court. The court, "upon motion made promptly and in any event at or before the time specified in the subpoena for compliance therewith, may . . . quash or modify the subpoena if it is unreasonable and oppressive." Fla. R.Civ. P. 1.410(c). Likewise, a party who successfully opposes a subpoena *duces tecum* may be awarded attorneys' fees. *Expeditions Unlimited, Inc. v. Rolly Marine Services, Inc.*, 447 So. 2d 453 (Fla. 4th DCA 1984). Here, subpoenas requesting information from Epstein's former attorneys regarding their representation of him, which were impermissibly served upon them *on the eve of trial* and without compliance of the Rules of Civil Procedure, are irrefutably and on their faces unreasonable and oppressive, mandating that they be quashed and sanctions awarded. *See Exhibit A.*

While "[i]t is apodictic that one who is a party has no standing to object to a subpoena issued to a non-party witness unless that subpoena asks for documents in which the party claims

some personal right or privilege or asks for documents in the party's possession." *Engel v. Rigot*, 434 So. 2d 954, 957 (Fla. 3d DCA 1983) (Pearson, J., concurring), it is obvious from the face of the subpoenas in the instant case not only that Epstein's timely objection to the issuance of the subpoenas was proper, but also that he has standing to move this court to quash them. Accordingly, Edwards's attempts to circumvent the Rules, and this privilege, mandate that these subpoenas be quashed and sanctions awarded.

CONCLUSION

For all of the reasons cited above, and in reliance upon the law cited herein, Epstein requests that this Court enter and Order Quashing Edwards's Subpoenas, precluding him from seeking this discovery from Epstein's former attorneys on the eve of trial, and awarding attorneys' fees incurred in the bringing of this Motion.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this September 21, 2013.

/s/ Tonja Haddad Coleman
Tonja Haddad Coleman, Esq.
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Fort Lauderdale, Florida 33301
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Attorneys for Epstein

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Attorneys for Jeffrey Epstein

IN THE CIRCUIT COURT OF THE
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Alan Dershowitz, Esquire

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013 at 9:00 a.m. and to have with you at that time and place the following:

Duces Tecum:

All documents* reflecting any and all communications between you (or anyone acting on your behalf) and Jeffrey Epstein (or anyone acting on his behalf) which communication related directly or indirectly to the basis for and/or the viability of any claim by Epstein against Bradley Edwards.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the

scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

*The term "documents" includes but is not limited to all non-identical copies of letters, notes, memoranda, e-mails, faxes, records, transcripts, and entries, regardless of whether they were made manually, mechanically, electronically, magnetically, digitally, or by any other means, and regardless of whether they are on papers, tape, film, electronic devices, electronic media, as well as application metadata and system metadata, or any other media or thing.

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 11/12 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
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 Bradley J. Edwards

CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for _____, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

COUNSEL LIST

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jgoldberger@agwpa.com;
smahoney@agwpa.com
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250 Australian Avenue South, Suite 1400
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Attorneys for Jeffrey Epstein

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).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Joseph L. Ackerman, Jr., Esquire

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013 at 9:00 a.m. and to have with you at that time and place the following:

duces tecum:

All documents* reflecting any and all communications between you (or anyone acting on your behalf) and Jeffrey Epstein (or anyone acting on his behalf) which communication related directly or indirectly to the basis for and/or the viability of any claim by Epstein against Bradley Edwards.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the

scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

*The term "documents" includes but is not limited to all non-identical copies of letters, notes, memoranda, e-mails, faxes, records, transcripts, and entries, regardless of whether they were made manually, mechanically, electronically, magnetically, digitally, or by any other means, and regardless of whether they are on papers, tape, film, electronic devices, electronic media, as well as application metadata and system metadata, or any other media or thing.

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page 3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 11 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
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 Bradley J. Edwards

CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for _____, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

COUNSEL LIST

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com;
smahoney@agwpa.com
Atterbury, Goldberger & Weiss, P.A.
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Tonja Haddad, P.A.
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Plaintiff(s),

vs.

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

Defendant(s).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Jack A. Goldberger, Esquire

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Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 17 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
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STATE OF FLORIDA
COUNTY OF _____

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It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

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COUNSEL LIST

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L.M., individually,

Defendant(s).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Darren K. Indyke, Esquire
301 East 66th Street, #10B
New York, NY 10065

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P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013
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DATED this 17 day of September, 2013.


Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
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STATE OF FLORIDA
COUNTY OF _____

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is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

COUNSEL LIST

Jack A. Goldberger, Esquire
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Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein

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).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Robert Critton, Esquire

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013 at 9:00 a.m. and to have with you at that time and place the following:

duces tecum: All documents* reflecting any and all communications between you (or anyone acting on your behalf) and Jeffrey Epstein (or anyone acting on his behalf) which communication related directly or indirectly to the basis for and/or the viability of any claim by Epstein against Bradley Edwards.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the

scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

*The term "documents" includes but is not limited to all non-identical copies of letters, notes, memoranda, e-mails, faxes, records, transcripts, and entries, regardless of whether they were made manually, mechanically, electronically, magnetically, digitally, or by any other means, and regardless of whether they are on papers, tape, film, electronic devices, electronic media, as well as application metadata and system metadata, or any other media or thing.

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 17 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
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 Bradley J. Edwards

CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for _____, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page 5

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Attorneys for Jeffrey Epstein

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).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Christopher E. Knight, Esquire

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013 at 9:00 a.m. and to have with you at that time and place the following:

Duces Tecum:

All documents* reflecting any and all communications between you (or anyone acting on your behalf) and Jeffrey Epstein (or anyone acting on his behalf) which communication related directly or indirectly to the basis for and/or the viability of any claim by Epstein against Bradley Edwards.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the

scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

*The term "documents" includes but is not limited to all non-identical copies of letters, notes, memoranda, e-mails, faxes, records, transcripts, and entries, regardless of whether they were made manually, mechanically, electronically, magnetically, digitally, or by any other means, and regardless of whether they are on papers, tape, film, electronic devices, electronic media, as well as application metadata and system metadata, or any other media or thing.

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 12 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
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 Bradley J. Edwards

CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for _____, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

COUNSEL LIST

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com;
smahoney@agwpa.com
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250 Australian Avenue South, Suite 1400
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Fort Lauderdale, FL 33301
Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein

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).

SUBPOENA WITHOUT DEPOSITION

THE STATE OF FLORIDA

TO: Roy Black, Esquire

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2013 at 9:00 a.m. and to have with you at that time and place the following:

duces tecum:

All documents* reflecting any and all communications between you (or anyone acting on your behalf) and Jeffrey Epstein (or anyone acting on his behalf) which communication related directly or indirectly to the basis for and/or the viability of any claim by Epstein against Bradley Edwards.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the

scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

*The term "documents" includes but is not limited to all non-identical copies of letters, notes, memoranda, e-mails, faxes, records, transcripts, and entries, regardless of whether they were made manually, mechanically, electronically, magnetically, digitally, or by any other means, and regardless of whether they are on papers, tape, film, electronic devices, electronic media, as well as application metadata and system metadata, or any other media or thing.

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

Edwards adv. Epstein
Case No. 502009CA040800XXXXMBAG
Subpoena to Non-Party
Page3

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this 11 day of September, 2013.



Jack Scarola
Florida Bar No.: 169440
Primary E-mail: jsx@searcylaw.com
Secondary E-mail(s): mep@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
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West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorneys for Bradley J. Edwards

CERTIFICATION OF RESPONSE TO
SUBPOENA DUCES TECUM WITHOUT DEPOSITION

STATE OF FLORIDA
COUNTY OF _____

The undersigned, as custodian of records for _____, certifies that the attached documents consisting of _____ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this _____ day of _____, 20____, who:

is personally known to me; or
 has produced _____ as identification; and who:
 did or
 did not, take an oath,

and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

Notary Public, State of Florida at Large
My Commission Expires:

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Attorneys for Jeffrey Epstein

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

vs.

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

Defendant/Counter-Plaintiff.

/

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S NOTICE OF
OBJECTION PURSUANT TO RULE 1.351 OF THE FLORIDA RULES OF CIVIL
PROCEDURE**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Rule 1.351 of the *Florida Rules of Civil Procedure*, hereby files this Objection to Defendant/Counter-Plaintiff Bradley Edwards's ("Edwards") "Subpoena Without Deposition" which Epstein assumes¹ Edwards intends to serve upon the following non-party individuals on or about September 21, 2013: Darren Indyke, Esq., Roy Black, Esq., Christopher Knight, Esq., Robert Critton, Esq., Joseph L. Ackerman, Jr., Esq., Alan Dershowitz, Esq., and Jack Goldberger, Esq.

Said objection is self-executing, and there is no need for Epstein to specify his objections at this time. *See Russell v. Stardust Cruisers, Inc.*, 690 So.2d 743 (Fla. 5th DCA 1997); *Russell v. Stardust Cruisers, Inc.*, 690 So. 2d 743, 744 (Fla. 5th DCA 1997). "[W]hen any objection is

¹ Edwards failed to file a proper Notice of Production from Non-Party as required by Rule 1.351 of the *Florida Rules of Civil Procedure*. *See also* Form 1.921 of the *Florida Rules of Civil Procedure*.

filed, Rule 1.351 ceases to be available.” *ABC Liquors, Inc. v. Berkey*, 589 So. 2d 457, 458 (Fla. 5th DCA 1991); *see also* Rule 1.351(c) (“If the person upon whom the subpoena is served objects at any time before the production of the documents or things, the documents or things shall not be produced under this rule, and relief may be obtained pursuant to [the rule governing depositions].”). *Morgan, Colling & Gilbert, P.A. v. Pope*, 756 So. 2d 201, 201 (Fla. 2d DCA 2000).

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this September 19, 2013.

/s/ Tonja Haddad Coleman
Tonja Haddad Coleman, Esq.
Florida Bar No.: 176737
Tonja Haddad, PA
5315 SE 7th Street
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Fort Lauderdale, Florida 33301
954.467.1223
954.337.3716 (facsimile)
Attorneys for Epstein

SERVICE LIST

CASE NO. 502009CA040800XXXXMBAG

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