

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

JEFFREY EPSTEIN,
Plaintiff,

CASE NO. 502009CA040800XXXXMBAG

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually and
L.M., individually,
Defendant(s).

NOTICE OF EXHIBIT IN SUPPORT OF OPPOSITION TO DISQUALIFICATION

COMES NOW Jeffrey Epstein, through the undersigned counsel, and files the attached exhibit and would state as follows:

1. The undersigned filed an Appearance as Co-Counsel on September 9, 2012.
2. Thereafter, and more particularly on September 12, 2012, the undersigned received the attached letter from Edwards' counsel requesting the undersigned withdraw.
3. Edwards noticed the case as ready for trial on September 19, 2012 and then filed a Motion to Disqualify Counsel after asserting the status of the matter as at issue.
4. The undersigned submits that this Exhibit when juxtaposed to the dates of the other mentioned pleadings, illustrates that the Motion to Disqualify was clearly filed to gain a tactical advantage and attempt to have Epstein without his counsel of choice for trial in the defense of Edwards' claims.

I HEREBY CERTIFY that a copy of the foregoing was furnished via Email to all counsel listed below, this 14TH day of November, 2012.

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September 12, 2012

Fred Haddad, Esquire
One Financial Plaza, Suite 2612
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Re: Edwards adv. Epstein

Dear Fred:

Brad Edwards has reminded me of your representation of Russ Adler in matters directly relating to many of the same issues presently in contention in the pending litigation against Jeffrey Epstein. Indeed, when Russ was deposed in our case, you appeared on his behalf, obviously supporting his position that neither he nor Brad was a knowing participant in the Rothstein Ponzi scheme.

As counsel to Adler you had complete access to all of the RRA files relating to Brad's prosecution of the civil claims against Epstein including all attorney work-product and attorney-client privileged communications. Those are documents as to which we have asserted and continue to assert all applicable privilege objections.

It certainly appears that these circumstances place you in an untenable conflict position, and since the privileges involved include privileges that belong to Brad's clients and to the former clients of RRA and Russ Adler, this is a conflict that Brad cannot waive.

While we would otherwise welcome your appearance as a presumed voice of reason on the opposite side of this case, we must and do object to any participation by you in the representation of Mr. Epstein. Please notice your immediate withdrawal.

Sincerely,

JACK SCAROLA
JS/mep

cc: Bradley J. Edwards, Esq.

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