

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

CIRCUIT CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE HAFELE

vs.

SCOTT ROTHSTEIN,
individually, BRADLEY EDWARDS,
individually,
Defendants/Counter-Plaintiffs.

PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN'S
REQUEST TO PRODUCE TO DEFENDANT/COUNTER-PLAINTIFF,
BRADLEY J. EDWARDS, REGARDING EXPERTS

COMES NOW the Plaintiff/Counter-Defendant, JEFFREY EPSTEIN, by and through undersigned counsel and pursuant to Florida Rules of Civil Procedure 1.350, requests that Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS, produce at the office of the undersigned, for inspection, and/or copying the following within thirty (30) days of this request.

1. Copies of any and all depositions of your expert witnesses taken in any other action that are in your possession (including your attorneys).
2. Any and all reports rendered by experts applicable to any and all issues in this case.
3. All correspondence between counsel for Defendant/Counter/Plaintiff and all experts in this matter, whether electronic or otherwise.
4. Each and every article, treatise, book, study, chapter, page, paper, letter, bill, invoice, photograph, videotape, report, records, note, survey, plat or other document or tangible evidence including electronically stored evidence in tangible form, furnished or made available to your expert in connection with this matter.

5. Each and every article, treatise, book, study, chapter, page, paper, letter bill, invoice, photograph, videotape, report, records, note, diagram, survey, plat, or other document, or tangible evidence, including electronically stored evidence in tangible form or other similar source of information considered or reviewed by your expert or upon which your expert relied in evaluating, investigating or formulating his or her opinions in connection with this matter.

6. Any other information reviewed by each expert in connection with this case.

7. All documents or tangible items of any nature pertaining to the following:

- a. The scope of your employment of expert witnesses in this case and the compensation for such service.
- b. The general litigation experience of your expert witnesses in this case, including the percentage of work performed for plaintiffs and defendants.
- c. The identity of legal actions in which each of your expert witnesses rendered opinions or evaluations during the last ten (10) years.
- d. The identity of other cases in which each of your expert witnesses in this case have testified by deposition or at trial during the last ten (10) years.
- e. An approximation of the portion of the expert's involvement as an expert witness, which may be based upon the number of hours, percentage of hours, or percentage of earned income derived from serving as an expert witness.

8. Copies of any and all bills, invoices, records, memoranda, checks, check stubs, receipts, 1099's, tax records or any other form of financial information evidencing payment or compensation paid by Defendant/Counter-Plaintiff and counsel for services provided by your expert witnesses for the last ten (10) years.

9. Your expert witnesses' most current curriculum vitae or resume.

10. Each and every document created by your experts in connection with this matter.

11. All articles, books, papers, manuals, studies or similar documents both formal and informal, written by your experts or to which your experts contributed,

12. Any opinions which were revised or modified.

13. A fee schedule for each and every expert.

14. All expert reports of the same expert(s) in your possession or that of your attorneys for any other case within the last ten (10) years.

15. Copies of all orders pertaining to your experts including any based on motions to limit or bar their opinions or work including but not limited to those orders related to **Frye** or **Daubert**.

It is requested that aforesaid productions be made in compliance with Florida Rules of Civil Procedure, at the law office of W. CHESTER BREWER, JR., P.A., 250 South Australian Avenue, Suite 1400, West Palm Beach, FL 33401. Inspection will be made b visual observation and/or copying.

If Defendant/Counter-Plaintiff's response will be that the copies are available for inspection s at the office of Defendant/Counter-Plaintiff's counsel, then it is requested that Plaintiff/Counter-Defendant provide the Defendant/Counter-Plaintiff with the cost of those copies so that they may be obtained by Plaintiff/Counter-Defendant's counsel.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached Electronic Service list, this _____ day of _____, 2017.

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By: /s/ W. Chester Brewer, Jr.
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