

#291874/mep

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).

MOTION FOR PROTECTIVE ORDER

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for the entry of a protective order with respect to discovery sought pursuant to the attached Notice and in support would show that the document production described in the Notice is not reasonably calculated to lead to the discovery of admissible evidence and unreasonably invades the privacy rights of third-parties.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 11th day of March, 2011.



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Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Edwards' Motion for Protective Order (Stettin)

COUNSEL LIST

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

JEFFREY EPSTEIN,

Plaintiff,

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

NOTICE OF TAKING DEPOSITION- DUCES TECUM*

PLEASE TAKE NOTICE that the undersigned attorney or an attorney of the firm will take the deposition of the following deponent and this deponent is to bring with him the following records on attached Duces Tecum on Schedule "A"

Name: **Records Custodian,
Herbert Stettin, Trustee in Bankruptcy for RRA**

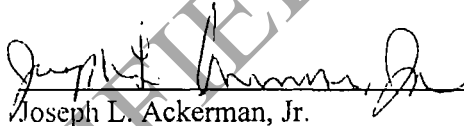
Date and Time: **Wednesday, March 16, 2011 at 11:00 a.m.**

Place: **Fowler White Burnett, P.A.
Espirito Santo Plaza
1395 Brickell Avenue, 14th Floor
Miami, Florida 33131**

Upon oral examination before ORANGE COURT REPORTING, Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for the use at trial, or for such other purposes as are permitted under the rules of the Court.

I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed and mailed this 4th day of March, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley, Attorneys for Bradley J. Edwards, 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409 and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, One E. Broward Blvd., Ste 700, Fort Lauderdale, FL 33301.

Respectfully submitted,



Joseph L. Ackerman, Jr.

Fla. Bar No. 235954

Christopher E. Knight

Fla. Bar No. 607363

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cc: Orange Court Reporting
(800) 275-7991

cc: Charles Lichtman, Esquire (w/enclosures)

EPSTEIN v ROTHSTEIN, EDWARDS

SCHEDULE "A"

DUCES TECUM/Herb Stettin, Trustee RRA/RC Deposition:

Any and all employment records for the following employees at Rothstein, Rosenfeldt, Adler, P.A. ("RRA"), that shows her full name, residence address, telephone, social security number, date of birth, application for employment at RRA, I-9 forms, W-4 forms, application(s) for insurance benefits, payroll records and pay stubs, all references/emergency contacts which will include names, addresses and telephone numbers and drivers license information and a photocopy of any documents RRA took a photocopy of with picture ID on the following:

1. Cara L. Holmes
2. Jacqui Johnson
3. Mercedes Estrada
4. Elizabeth Kim
5. Christina Fitch
6. Carl Linder
7. Jonathan Birkman
8. Rob Buschel