

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).

RESPONSE TO PLAINTIFF/COUNTER-DEFENDANT
JEFFREY EPSTEIN'S REQUEST FOR PRODUCTION TO
DEFENDANT/COUNTER-PLAINTIFF BRADLEY EDWARDS

Bradley J. Edwards, by and through his undersigned attorneys and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Jeffrey Epstein's, Request for Production dated September 5, 2017 as follows:

1. Objection. Attorney work product.
2. Objection. The reference to "the period in question" is undefined, vague and ambiguous; the request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
3. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.

4. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
5. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
6. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
7. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
8. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.

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9. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.
10. Objection. The request is overly broad and seeks information that is irrelevant, immaterial, and not reasonably calculated to lead to the discovery of admissible evidence; information requested includes attorney work product; attorney-client privileged information, and information protected by rights to financial privacy.

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-Serve to all Counsel on the attached list, this 5th day of October, 2017.



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