

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).

2012 SEP 25 PM 2:30
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 9

FILED

MOTION TO DISQUALIFY OPPOSING COUNSEL

Counter-plaintiff, Bradley J. Edwards, by and through his undersigned attorneys, moves this Honorable Court for entry of an order disqualifying Attorney Fred Haddad, from further participation in this proceeding and in support thereof would show:

1. Mr. Haddad served as defense counsel for Russel Adler, a former law partner of Mr. Edwards at the firm of Rothstein Rosenfeldt & Adler (RRA).

2. The subject matter of the representation included matters directly related to circumstances at issue in this proceeding, including specifically the legitimacy of the prosecutions against Mr. Epstein and the extent to which members of the RRA firm other than Rothstein knew of and participated in the Ponzi scheme orchestrated by Rothstein.

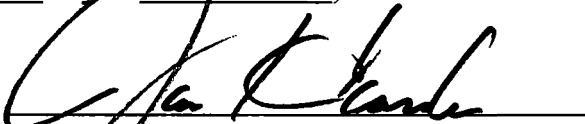
3. In the course of Mr. Haddad's representation of Mr. Adler, Mr. Haddad was afforded unrestricted access to the files of RRA including the litigation files generated in the course of prosecuting claims against the counter-defendant, Jeffrey Epstein.

4. Included among the Epstein files are materials protected by attorney-client and work product privilege. Those privileges have been consistently asserted in the context of this litigation to protect the interests of RRA's former clients who continue to be represented by Mr. Edwards in a currently pending Federal Court action.

5. Mr. Haddad's access to materials to which he is denied access in the context of this litigation creates an irreconcilable conflict of interest which prejudices the counter-plaintiff and compromises the counter-plaintiff's obligations to preserve the confidences of his clients.

Wherefore, the counter-plaintiff respectfully requests the entry of an order disqualifying Mr. Haddad from further involvement in this matter.

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 25th day of Sept., 2012.



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