

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).

FILED  
2012 SEP 25 PM 2:30

SHARON R. BOCK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 9

**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.

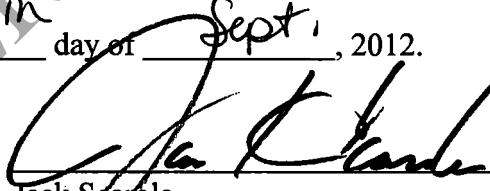
**Edwards adv. Epstein**  
**Case No.: 502009CA040800XXXXMBAG**  
**Motion to Disqualify Opposing Counsel**

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 25<sup>th</sup> day of Sept., 2012.

  
\_\_\_\_\_  
Jack Scarola  
Florida Bar No.: 169440  
Primary E-mail: [jsx@searcylaw.com](mailto:jsx@searcylaw.com)  
Secondary E-mail(s): [mep@searcylaw.com](mailto:mep@searcylaw.com)  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: (561) 686-6300  
Fax: (561) 383-9451  
Attorney for Bradley J. Edwards

**Edwards adv. Epstein**  
**Case No.: 502009CA040800XXXXMBAG**  
**Motion to Disqualify Opposing Counsel**

**COUNSEL LIST**

Jack A. Goldberger, Esquire  
[jgoldberger@agwpa.com](mailto:jgoldberger@agwpa.com);  
[smahoney@agwpa.com](mailto:smahoney@agwpa.com)  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

Bradley J. Edwards, Esquire  
[bje.efile@pathtojustice.com](mailto:bje.efile@pathtojustice.com);  
[staff.efile@pathtojustice.com](mailto:staff.efile@pathtojustice.com)  
Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, FL  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954)-524-2820  
Fax: (954)-524-2822

Fred Haddad, Esquire  
[Dee@FredHaddadLaw.com](mailto:Dee@FredHaddadLaw.com);  
[haddadfm@aol.com](mailto:haddadfm@aol.com)  
Fred Haddad, P.A.  
One Financial Plaza, Suite 2612  
Fort Lauderdale, FL 33394  
Phone: (954)-467-6767  
Fax: (954)-467-3599  
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire  
[marc@nuriklaw.com](mailto:marc@nuriklaw.com)  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954)-745-5849  
Fax: (954)-745-3556  
Attorneys for Scott Rothstein

Lilly Ann Sanchez, Esquire  
[lsanchez@thelsfirm.com](mailto:lsanchez@thelsfirm.com)  
The L-S Law Firm  
1441 Brickell Avenue, 15th Floor  
Miami, FL 33131  
Phone: (305)-503-5503  
Fax: (305)-503-6801  
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire  
[tonja@tonjahaddad.com](mailto:tonja@tonjahaddad.com);  
[Debbie@Tonjahaddad.com](mailto:Debbie@Tonjahaddad.com)  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301  
Phone: (954)-467-1223  
Fax: (954)-337-3716  
Attorneys for Jeffrey Epstein