

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).

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**NOTICE OF PRODUCTION FROM NON-PARTY**

TO: Tonja Haddad Coleman, Esquire  
tonja@tonjahaddad.com; efiling@tonjahaddad.com  
Tonja Haddad, P.A.  
315 SE 7th Street, Suite 301  
Fort Lauderdale, FL 33301

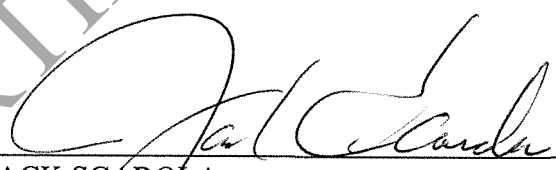
William Chester Brewer, Esquire  
wcblaw@aol.com; wcblawasst@gmail.com  
250 S Australian Avenue, Suite 1400  
West Palm Beach, FL 33401

YOU ARE NOTIFIED that after ten (10) days from the date of service of this Notice, if service is by delivery, or fifteen (15) days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned will issue or apply to the Clerk of this Court for issuance of the attached Subpoenas directed to the following individual to produce the items listed at the time and place specified in the Subpoena.

1. Joseph L. Ackerman, Esquire  
Fowler White Burnett, P.A.  
515 N. Flagler Drive, Suite 2100  
West Palm Beach, FL 33401

2. Robert D. Critton, Esquire  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401
3. Jack A. Goldberger, Esquire  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401
4. Roy Black, Esquire  
Black Srebnick Kornspan and Stumpf, P.A.  
201 South Biscayne Boulevard, #1300  
Miami, FL 33131

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 19<sup>th</sup> day of Sept., 2017.

  
JACK SCAROLA  
Florida Bar No.: 169440  
Attorney E-Mail: [jsx@searcylaw.com](mailto:jsx@searcylaw.com); and  
[mmccann@searcylaw.com](mailto:mmccann@searcylaw.com)  
Primary E-Mail: [\\_scarolateam@searcylaw.com](mailto:_scarolateam@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  
Attorneys for Bradley J. Edwards

**COUNSEL LIST**

William Chester Brewer, Esquire  
wcblaw@aol.com; wcblawasst@gmail.com  
250 S Australian Avenue, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-655-4777  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

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

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

Fred Haddad, Esquire  
Dee@FredHaddadLaw.com;  
Fred@FredHaddadLaw.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

Tonja Haddad Coleman, Esquire  
tonja@tonjahaddad.com;  
efiling@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

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

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).

\_\_\_\_\_ /

**SUBPOENA DUCES TECUM TO NON-PARTY**

THE STATE OF FLORIDA

TO: Joseph L. Ackerman, Esquire  
Fowler White Burnett, P.A.  
515 N. Flagler Drive, Suite 2100  
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A.,  
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 10, 2017 at 1:00  
p.m. and to have with you at that time and place the following:

**Duces Tecum:**

**All documents\* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.**

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or

**CERTIFICATION OF RESPONSE TO**  
**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

The undersigned, as custodian of records for Joseph L. Ackerman, Esquire, certifies that the attached documents consisting of \_\_\_\_\_ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

\_\_\_\_\_

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this \_\_\_\_\_ day of \_\_\_\_\_, 2017, who:

☐ is personally known to me; or  
☐ has produced \_\_\_\_\_ as identification; and who:  
☐ did or  
☒ did not, take an oath,  
and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

\_\_\_\_\_  
Notary Public, State of Florida at Large  
My Commission Expires:

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).

\_\_\_\_\_ /

**SUBPOENA DUCES TECUM TO NON-PARTY**

THE STATE OF FLORIDA

TO: Robert D. Critton, Esquire  
303 Banyan Boulevard, Suite 400  
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A.,  
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 1:30  
p.m. and to have with you at that time and place the following:

**Duces Tecum:**

**All documents\* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.**

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data

compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. “Documents” also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or
- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,



You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2017.



JACK SCAROLA  
Florida Bar No.: 169440  
Attorney E-Mail(s): [jsx@searcylaw.com](mailto:jsx@searcylaw.com); and  
[mmccann@searcylaw.com](mailto:mmccann@searcylaw.com)  
Primary E-mail: [\\_scarolateam@searcylaw.com](mailto:_scarolateam@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  
Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO**  
**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

The undersigned, as custodian of records for Robert D. Critton, Esquire, certifies that the attached documents consisting of \_\_\_\_\_ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

\_\_\_\_\_

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this \_\_\_\_\_ day of \_\_\_\_\_, 2017, who:

☐ is personally known to me; or  
☐ has produced \_\_\_\_\_ as identification; and who:  
☐ did or  
☐ did not, take an oath,  
and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

\_\_\_\_\_  
Notary Public, State of Florida at Large  
My Commission Expires:

IN THE CIRCUIT COURT OF THE  
FIFTEENTH JUDICIAL CIRCUIT, IN AND  
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

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

Defendant(s).

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**SUBPOENA DUCES TECUM TO NON-PARTY**

THE STATE OF FLORIDA

TO: Jack A. Goldberger, Esquire  
Atterbury Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A.,  
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 10:30  
a.m. and to have with you at that time and place the following:

**Duces Tecum:**

**All documents\* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.**

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

These items will be inspected and may be copied at that time. You will not be required to surrender the original items. You may comply with this subpoena by providing legible copies of the items to be produced to the attorney whose name appears on this subpoena on or before the scheduled date of production. You may condition the preparation of the copies upon the payment in advance of the reasonable cost of preparation. You may mail or deliver the copies to the attorney whose name appears on this subpoena and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena. **THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.**

If you fail to:

- 1) Appear as specified; or

- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2017.



JACK SCAROLA  
Florida Bar No.: 169440  
Attorney E-Mail(s): [jsx@searcylaw.com](mailto:jsx@searcylaw.com); and  
[mmccann@searcylaw.com](mailto:mmccann@searcylaw.com)  
Primary E-mail: [\\_scarolateam@searcylaw.com](mailto:_scarolateam@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  
Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO**  
**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

The undersigned, as custodian of records for Jack A. Goldberger, Esquire, certifies that the attached documents consisting of \_\_\_\_\_ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

\_\_\_\_\_  
The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this \_\_\_\_\_ day of \_\_\_\_\_, 2017, who:

☐ is personally known to me; or  
☐ has produced \_\_\_\_\_ as identification; and who:  
☐ did or  
☐ did not, take an oath,  
and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

\_\_\_\_\_  
Notary Public, State of Florida at Large  
My Commission Expires:

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Plaintiff(s),

vs.

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

Defendant(s).

\_\_\_\_\_ /

**SUBPOENA DUCES TECUM TO NON-PARTY**

THE STATE OF FLORIDA

TO: Roy Black, Esquire  
Black Srebnick Kornspan and Stumpf, P.A.  
201 South Biscayne Boulevard, #1300  
Miami, FL 33131

YOU ARE COMMANDED to appear at Searcy Denney Scarola Barnhart & Shipley, P.A.,  
2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida, 33409 on October 6, 2017 at 3:30  
p.m. and to have with you at that time and place the following:

**Duces Tecum:**

**All documents\* regarding your representation of Jeffrey Epstein with respect to any allegation of criminal wrongdoing against Jeffrey Epstein and any consideration of and involvement in the filing and prosecution of any claim by Jeffrey Epstein against Scott Rothstein and/or Bradley Edwards.**

\*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

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- 1) Appear as specified; or



- 2) Furnish the records instead of appearing as provided above; or
- 3) Object to this subpoena,

You may be in contempt of court. You are subpoenaed to appear by the following attorney, and unless excused from this subpoena by this attorney or the court, you shall respond to this subpoena as directed.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2017.



JACK SCAROLA  
Florida Bar No.: 169440  
Attorney E-Mail(s): [jsx@searcylaw.com](mailto:jsx@searcylaw.com); and  
[mmccann@searcylaw.com](mailto:mmccann@searcylaw.com)  
Primary E-mail: [\\_scarolateam@searcylaw.com](mailto:_scarolateam@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  
Attorneys for Bradley Edwards

**CERTIFICATION OF RESPONSE TO**  
**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**

STATE OF FLORIDA  
COUNTY OF \_\_\_\_\_

The undersigned, as custodian of records for Roy Black, Esquire, certifies that the attached documents consisting of \_\_\_\_\_ pages represents a true copy of all items within my possession, custody or control which are described in the Subpoena Duces Tecum Without Deposition served on me in the above styled action and each page is numbered by me for identification. Production is complete and has been numbered by the custodian of records.

It is further certified that originals of the items produced are maintained under the direction, custody and control of the undersigned.

\_\_\_\_\_

The foregoing Certification was acknowledged before me, an officer duly authorized in the State and County aforesaid to take acknowledgments, this \_\_\_\_\_ day of \_\_\_\_\_, 2017, who:

☐ is personally known to me; or  
☐ has produced \_\_\_\_\_ as identification; and who:  
☐ did or  
☒ did not, take an oath,  
and who executed the foregoing certification, and who acknowledged the foregoing certification to be freely and voluntarily executed for the purposes therein recited.

\_\_\_\_\_  
Notary Public, State of Florida at Large  
My Commission Expires: