

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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**RESPONSE TO REQUEST TO PRODUCE REGARDING EXPERTS**

Defendant/Counter-Plaintiff, Bradley J. Edwards, by and through the undersigned attorney and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby responds to Plaintiff/Counter-Defendant, Jeffrey Epstein's, Request to Produce dated October 13, 2017 as follows:

1. Copies of any and all depositions of your expert witnesses taken in any other action that are in your possession (including your attorneys).

**Response: Previously disclosed.**

2. Any and all reports rendered by experts applicable to any and all issues in this case.

**Response: Previously disclosed.**

3. All correspondence between counsel for Defendant/Counter-Plaintiff and all experts in this matter, whether electronic or otherwise.

**Response: See responsive documents Bates-numbered EDWARDS/JANSEN-000001 through EDWARDS/JANSEN-000280.**

4. Each and every article, treatise, book, study, chapter, page, paper, letter, bill, invoice, photograph, videotape, report, records, note, survey, plat or other document or tangible

evidence including electronically stored evidence in tangible form, furnished or made available to your expert in connection with this matter.

**Response: Previously disclosed.**

5. Each and every article, treatise, book, study, chapter, page, paper, letter, bill, invoice, photograph, videotape, report, records, note, diagram, survey, plat, or other document, or tangible evidence, including electronically stored evidence in tangible form or other similar source of information considered or reviewed by your expert or upon which your expert relied in evaluating, investigating or formulating his or her opinions in connection with this matter.

**Response: Previously disclosed.**

6. Any other information reviewed by each expert in connection with this case.

**Response: Previously disclosed.**

7. All documents or tangible items of any nature pertaining to the following:

**Response: Previously disclosed.**

- a. The scope of your employment of expert witnesses in this case and the compensation for such service.
- b. The general litigation experience of your expert witnesses in this case, including the percentage of work performed for plaintiffs and defendants.
- c. The identity of legal actions in which each of your expert witnesses rendered opinions or evaluations during the last ten (10) years.

d. The identity of other cases in which each of your expert witnesses in this case have testified by deposition or at trial during the last ten (10) years.

e. An approximation of the portion of the expert's involvement as an expert witness, which may be based upon the number of hours, percentage of hours, or percentage of earned income derived from serving as an expert witness.

8. Copies of any and all bills, invoices, records, memoranda, checks, check stubs, receipts, 1099's, tax records or any other form of financial information evidencing payment or compensation paid by Defendant/Counter-Plaintiff and counsel for services provided by your expert witnesses for the last ten (10) years.

**Response: Previously disclosed.**

9. Your expert witnesses' most current curriculum vitae or resume.

**Response: Previously disclosed.**

10. Each and every document created by your experts in connection with this matter.

**Response: Previously disclosed.**

11. All articles, books, papers, manuals, studies or similar documents both formal and informal, written by your experts or to which your experts contributed.

**Response: All identified in prior disclosure.**

12. Any opinions which were revised or modified.

**Response: See responsive documents Bates-numbered EDWARDS/JANSEN-000001 through EDWARDS/JANSEN-000280.**

13. A fee schedule for each and every expert.

**Response: Previously disclosed.**

14. All expert reports of the same expert(s) in your possession or that of your attorneys for any other case within the last ten (10) years.

**Response: Previously disclosed.**

15. Copies of all orders pertaining to your experts including any based on motions to limit or bar their opinions or work including but not limited to those orders related to Frye or Daubert.

**Response: Not applicable.**

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 13 day of November, 2017.

  
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