

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY, FLORIDA

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
REQUEST FOR JUDICIAL NOTICE¹

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), pursuant to sections 90.202 and 90.203, Florida Statutes, requests that this Court take judicial notice of the court files and the court documents included in Epstein's Appendix of Documents in Support of his Revised Omnibus Motion in Limine filed on November 21, 2017, (D.E. 1078-1085) as follows:

1. *Jane Doe v. Jeffrey Epstein*; United States District Court, Southern District of Florida, Case No. 9:08-cv-80893-KAM
 - a. 4/9/09, Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorneys from Revealing Provisions in the Agreement (D.E. 32) [App. 2]
 - b. 4/17/09, Plaintiff's First Amended Complaint (D.E. 38) [App. 3]
2. *Jane Doe 2 v. Jeffrey Epstein*; United States District Court, Southern District of Florida, Case No. 08-cv-80119-MARRA/JOHNSON
 - a. 6/19/09, Plaintiff's Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of

¹ D.E. references relate to the cases in which the documents were filed.

- Epstein, and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165) [App. 5]
- b. 11/5/09, Order (D.E. 400) [App. 6]
3. *L.M. v. Jeffrey Epstein*; United States District Court, Southern District of Florida Case No. 9:08-cv-81092-KAM
- a. 7/27/09, Complaint (D.E. 1) [App. 8]
 - b. Court Docket [App. 9]
4. *E.W. v. Jeffrey Epstein*; 15th Judicial Circuit, Palm Beach County Case No. 50-2008-CA-028058-XXXX-MB
- a. 8/10/09, Plaintiff's Request for Entry Upon Land (D.E. 143) [App. 11]
5. *L.M. v. Jeffrey Epstein*; 15th Judicial Circuit, Palm Beach County Case No. 50-2008-CA-028051-XXXX-MB
- a. Epstein's Motion for Protective Order Regarding Depositions of Lawrence Visoski and David Hart Rogers (D.E. 159) [App. 12]
6. *United States of America v. Scott W. Rothstein* (Forfeiture Action); United States District Court, Southern District of Florida, Case No. 0:09-CV-61780-WJZ
- a. 11/9/09, Verified Complaint for Forfeiture *In Rem* (D.E. 1) [App. 15]
 - b. 11/23/09, Amended Verified Complaint for Forfeiture *In Rem* (D.E. 14) [App. 18]
7. *Razorback Funding, LLC v. Rothstein*; 17th Judicial Circuit, Broward County, Case No. 062009CA062943AXXXCE
- a. 11/20/09, Complaint (D.E. 3) [App. 17]
 - b. 11/25/09, Amended Complaint (D.E. 12) [App. 21]
8. *United States v. Rothstein*; United States District Court, Southern District of Florida, Case No. 0:09-cr-60331-JIC
- a. 12/1/09, Information (D.E. 1) [App. 22]

To streamline the trial of this matter and the hearing on Epstein's Revised Omnibus Motion in Limine and to reduce costs, Epstein respectfully requests that the Court take judicial notice of these court records. Under section 90.202(6), Florida Statutes, a court may take judicial notice of records of any court of this state or of any court of record of the United States or of any state, territory, or jurisdiction of the United States. A court, however, shall take judicial notice of such matters when (1) proper notice is given to the adverse party, and (2) the court is furnished with sufficient information to enable it to take judicial notice of the matter. Florida Evidence Code § 90.203.

Epstein has provided notice to Defendant/Counter-Plaintiff and he has provided the Court with sufficient information herein and in his Appendix of Documents in Support of his Revised Omnibus Motion in Limine, to take judicial notice of these court records. Accordingly, Epstein respectfully requests judicial notice of the court records identified above and included in his Appendix.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 22, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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