

IN THE CIRCUIT COURT OF THE 15th JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION
CASE NO. 502009CA040800XXXXMBAG
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

PLAINTIFF'S REQUEST FOR PRODUCTION OF APRIL 7, 2008

Plaintiff Jeffrey Epstein, pursuant to Rule 1.350, Fla. R.Civ. P., requests that defendant Bradley J. Edwards, produce for inspection and copying the documents identified below within the time limits provided by the Rule at the office of the undersigned.

I. DEFINITIONS AND INSTRUCTIONS

1. "Document" means any document known to you and every such document which can be located or discovered by reasonably diligent efforts; any original or copy of such in your custody, possession or control, including, but not limited to, any printed, written, recorded, taped, electronic (e-mails), graphic, or other tangible matter from whatever source, however produced or reproduced, whether in draft or otherwise, whether sent or received or neither, including the original, all amendments and addenda and any non-identical copy (whether different from the original because of notes made on or attached to such copy or otherwise) of any and all writings, correspondence, letters, telegrams, facsimile communications, cables, notes, notations, papers, newsletters, memoranda, inter-office communications, releases, agreements, contracts, books, pamphlets, studies, minutes of meetings, recordings or other memorials of any type of personal or telephone conversations, meetings or conferences (including, but not limited to, telephone bills and long distance charge slips), reports, analyses, evaluations, estimates, projections, forecasts, receipts, statements, accounts, books of account, diaries, calendars, desk pads, appointment books, stenographer's notebooks, transcripts, ledgers, registers, worksheets, journals, statistical records, cost sheets, summaries, lists, tabulations, digests, cancelled or uncanceled checks or drafts, vouchers, charge slips, invoices, purchase orders, accountant's reports, financial statements, newspapers, periodical or magazine materials, and any material underlying, supporting or used in the preparation of any documents or record whatsoever.

2. "Referring to", "reflecting", "supporting", "evidencing" or "relates to" means in any way directly or indirectly, concerning, disclosing, describing, confirming, or representing.

3. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.

4. "Epstein" means the Plaintiff.

5. "Defendant", "you" and/or "Edwards" means Bradley J. Edwards and agent or attorney for him and any other person acting or purporting to act for, or on behalf of Edwards or under Edwards's authority or control.

6. "Complaint" refers to the initial pleading or Complaint filed by Plaintiff in this action and any amended pleadings.

7. All other terms are defined as they are in the Complaint.

8. Any document as to which a claim of privilege is or will be asserted should be identified by author, signatory, description (e.g., letter, memorandum, facsimile, recording, etc.), title (if any), date, addresses (if any), general subject matter, present depository and present custodian and a complete statement of the ground for the claim of privilege should be set forth.

9. If you maintain that any document that is requested has been destroyed, set forth the contents of the document, the date of such destruction and the name of the person who authorized or directed such destruction.

10. If any of the documents requested cannot be produced in full, produce to the extent possible, specifying the reasons for the inability to produce the remainder.

11. In responding to the following document requests, please specify which documents are responsive to each request and, where appropriate, to each sub-part thereof.

12. This request is a continuing one. If after producing documents, you become aware of any further responsive documents, you are requested to produce such additional documents.

13. If you maintain that documents responsive to any Request contained herein have previously been produced in response to an earlier Request, so state and provide the date-number if so numbered.

14. Unless otherwise stated, the time period for this request is from May 1, 2010 through the date of service.

REQUESTS

1. All documents reflecting any allegedly public statements made by Plaintiff regarding "his criminal activity" as referenced by counsel to Defendant Edwards in an email of March 14, 2011 to Plaintiff's counsel Ackerman.
2. All documents reflecting or tending to support Defendant Edwards's position that Plaintiff waived his Fifth Amendment rights under the U.S. Constitution.
3. All documents reflecting or tending to support Defendant Edwards's position that Plaintiff has lost his Fifth Amendment rights by operation of law or otherwise except by waiver.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 7th day of April, 2011 to Gary M. Farmer, Jr., Esq., Farmer, Jaffee, Weissing, Edwards, Fistos, et al, 425 N. Andrews Avenue, Suite 2, Fort Lauderdale, FL 33301; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301; and Jack Scarola, Esquire, Searcy Denney Scarola et al., 2139 Palm Beach Lakes Boulevard, P.C. Drawer 3626, West Palm Beach, FL 33409.

10/14/2011 Email for
Joseph L. Ackerman, Jr.
Fla. Bar No. 235954

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