

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).

MOTION TO COMPEL

Counterplaintiff, Bradley J. Edwards, by and through his undersigned attorneys, moves this Honorable Court to enter an order compelling Counterdefendant, Jeffrey Epstein to respond to the attached Requests for Admissions over the Counterdefendant's assertions and objections and in support would show that the response to Request #1 is impermissibly evasive and the objection based on privilege to Request #2 has been waived.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel

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 26th day of Feb, 2018.



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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
RESPONSE TO DEFENDANT/COUNTER-PLAINTIFF
BRADLEY J. EDWARDS' REQUESTS FOR ADMISSION**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), pursuant to Florida Rule of Civil Procedure 1.370, responds to Defendant/Counter-Plaintiff Bradley J. Edwards' ("Edwards") February 6, 2018, Requests for Admission as follows:

1. The printout of your New York State Sex Offender registration page attached [to the Request] as Exhibit 'A' is authentic.

RESPONSE

Epstein cannot admit or deny this request because he has no control over or personal knowledge about the authenticity of the registration attached as Exhibit 'A' to Edwards' Request.

2. The information contained in the printout of your New York State Sex Offender registration page attached [to the Request] as Exhibit 'A' is accurate.

RESPONSE

Epstein cannot admit or deny this request because any response would require the disclosure of information which could communicate a statement of fact that is testimonial in nature. *Fisher v. United States*, 425 U.S. 391, 410 (1976). There is a

substantial and reasonable basis for concern that such testimonial statements of fact could reasonably furnish a “link in the chain of evidence” that could be used to prosecute him in future criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). Additionally, Epstein cannot respond to this request without waiving his Fifth, Sixth and Fourteenth Amendment Rights as guaranteed by the United States Constitution and Article I, Sections 2, 9 and 16 of the Florida Constitution.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on February 20, 2018, through the Court’s e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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