

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

JEFFREY EPSTEIN,

Plaintiff,

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

FILED
11 JAN -4 AM 10:43
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 2

**PLAINTIFF JEFFREY EPSTEIN'S NOTICE OF FILING SUPPLEMENTAL EXHIBIT
TO HIS RESPONSE TO EDWARDS' MOTION FOR SUMMARY JUDGMENT**

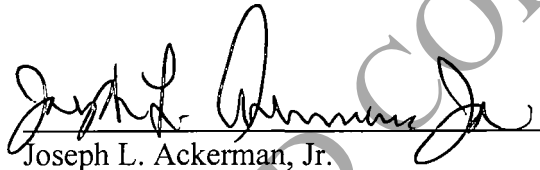
Plaintiff, Jeffrey Epstein, by and through his undersigned counsel and pursuant to the Florida Rules of Civil Procedure files this his notice of his intention to rely on the attached exhibit as part of his Response to Defendant Edwards' Motion for Summary Judgment.

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I HEREBY CERTIFY that a true and correct copy of the foregoing was faxed and mailed this 30th day of December, 2010 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley,

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[mah] W:\80743\NOF Supplemental Exhibit to Epstein's Response to Edw' MSJ{12/30/10-15:39}

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

Chapter 11

Debtor.

**TRUSTEE'S MOTION TO FIX AND COMPEL PAYMENT BY QTASK OF
ATTORNEYS FEES AND SANCTIONS FOR ITS CONTEMPT OF COURT**

Trustee, Herbert Stettin, through his undersigned counsel, moves this Court to fix the amount of attorneys fees and sanctions to be awarded in favor of the debtor and against Qtask, Inc. ("Qtask"), arising out of this Court's Order of Contempt against Qtask (D.E. 776), and for other relief described below, and states:

I. INTRODUCTION.

As the Court no doubt recalls, Qtask already has been found in contempt of court for failing to comply with a Rule 2004 subpoena issued by the Trustee on December 8, 2009 (D.E. 95). In the Order of Contempt, the Court found both that Qtask would be responsible for paying (i) the Trustee's attorneys fees and costs calculated from February 9, 2009 and continuing thereafter, and (ii) a \$5000 per day sanction to the Trustee for continued non-compliance, effective as of July 9, 2010. In addition, to assist the Court in ascertaining the degree of Qtask's non-compliance with the Trustee's outstanding discovery and in conjunction with the Order of Contempt, the Court appointed Robert Moody ("Moody") as its expert to review and report back to the Court.

On December 13, 2010, Moody submitted his Expert Report, docketed on December 17, 2010 as DE #1241. That report unequivocally and thoroughly supports the positions the Trustee had taken before the Court for the many months of Qtask's non-compliance, therefore reaffirming the basis for all of the Court's preceding orders, including the awarded sanctions.

II. THE EXPERT REPORT PROVES QTASK'S NONCOMPLIANCE.

Verbatim highlights of the findings from the Expert Report include:

**Qtask Has Not Complied with the Subpoena [D.E. #95]
or the March 8, 2010 Order [D.E. #411]:**

"Based upon a review of the record, the interviews conducted and other material/software provided to me, it is clear that the Trustee has not received the information it has requested and it has not been provided the information necessary to be able to rely on the information it has received as true and correct."

Report, at page 6.

**Qtask's Productions to Date Have Not Complied
with the Subpoena or the March 8, 2010 Order:**

"Initial productions were useless.

The initial productions by Qtask were CD/DVDs containing what essentially exists as the computer data version of a run on sentence. The initial production consisted of a lot of computer code and data but no format or structure for the Trustee to use.

The second production, as reported by Qtask, did provide structure through specialized programming but, as reported by the Trustee, did not have the functionality or ease of use that the Trustee needed to work with the data set."

Report, at page 6.

**Qtask Has Prevented Compliance with the Subpoena
by Blocking the Trustee's Access to the Shadowbox:**

"Access to the "shadowbox" has been blocked. The Trustee still does not have the passwords associated with the individual user accounts.

Access to the shadowbox has not been provided. During the initial interviews, the Trustee disclosed that the passwords on the "shadow box" had not been reset and that there were users and projects that the Trustee could not access. Shortly after this interview, this information was shared with Qtask. Qtask responded that this was the first they had heard of the problem. As of

this date, it is my understanding that this issue still remains.”

Report, at page 7.

**Qtask has Prevented the Trustee from Understanding the
Universe of Data Available so the Trustee can Narrow its Search:**

“Cannot determine the total universe of potential or responsive data.

The size of the responsive data universe can only be resolved through a review of the Qtask environment. The Trustee has stated that it is requesting that Qtask only comply with its subpoena and provide access to the information which is responsive to this subpoena.

Qtask has stated that it is complying with the Court's order and producing the data within the limits set by the Court.

From my interviews and review of the information provided, the Trustee appears to be asking for a broader range of access. This need for broader access is a byproduct of the investigative process and the lack of information which has been received to date.”

Report, at page 8.

**The Court Has Already Provided a Proper
Mechanism to Protect Individual Users' Rights:**

“If the Trustee identifies a particular user or project, the Court through its order has already provided a mechanism to protect the user, the user's projects and the user's specific data.”

Report at page 8.

“Qtask has raised the issue that many of its clients have customer, private or highly sensitive data that cannot be viewed or accessed without appropriate clearance.

As previously addressed, the concern of Qtask regarding their client's data must not be taken lightly. No matter the source, highly sensitive data must be protected and where possible be excluded from even a casual review, if determined that the information is not relevant to the Trustee's investigation. Based upon the March 8, 2010 order, the Trustee and the Court have made provisions for the owner of the data to be informed and to object to the production, if necessary.”

Report, at page 11.

Qtask Can Monitor the Trustee's Investigation through the Shadowbox:

“Qtask is monitoring the Trustee's investigation.

Through interviews, Qtask has acknowledged that it knows what and when the Trustee has accessed on Qtask because they are part of the same projects as the Trustee and they maintain

administrative and technical control over the workspace the Trustee is conducting its investigation in.

A review of the Qtask environment shows that this is an inherent feature of Qtask and not something that was created to monitor the Trustee. Regardless of how it came into existence, the fact is this feature does exist. Furthermore, the "shadow box" being hosted on the Qtask network does offers a significant security risk to the Trustee's investigation."

**Qtask Has Stopped Even Attempting to Comply
With the Trustee's Requests for Information from Qtask:**

"The Trustee and Qtask have both acknowledged that Qtask has stopped complying with these subsequent requests because Qtask feels that they are too burdensome and it should not be made to "run back to the warehouse numerous times" to meet the Trustee's demands."

Report, at page 9.

"The Trustee must be able to make requests for additional information as it identifies targets of interest. The Trustee must be able to rely on the timeliness and the accuracy of the data it requests."

Report, at page 9.

**Qtask Has Used Wrongfully Assertions of 3rd
Parties' Rights to Obstruct the Trustee's Investigation:**

"Qtask has repeatedly claimed that the information contained within their system does not belong to them, it belongs to their client. They have stated that they are the gatekeepers and that they are not able to provide access because they do not own the information.

Qtask's classification of the data is correct but its role in its protection is flawed.

Qtask operates a company very similar to many other service bureaus such as America Online, Hotmail, Gmail, Yahoo, etc. Each of these companies has procedures in place to produce information that is requested.

Qtask has an obligation to secure the information when properly requested and should follow their procedures to produce the information as required.

Qtask should not be taking the position of questioning the Trustee as to why the information is needed or what they will be doing with the information. They are the intermediary between the housed data and the requesting party.

Report, at page 10.

Qtask's argument and justification for failing to produce client data, takes the form that they are the gatekeeper to the data and not the owner and cannot produce what they do not own, is flawed."

Report, at page 11.

**Qtask Has Wrongfully Obstructed the Trustee's Investigation
by Attempting to Filter the Trustee's Requests for Data:**

"Qtask has requested that they be informed as to all data the Trustee desires access to and once they have been informed of the data targets, they will determine if it is appropriate and provide access.

Once again, Qtask is attempting to fulfill a role greater than that of the gatekeeper. As the gatekeeper, their role is to provide a process to facilitate the request and delivery of data.

Determination as to appropriateness falls first on the Trustee and if appropriateness is questioned, it then must fall on the Court."

Qtask Cannot be Permitted to Control the Production Process:

"Additionally, since Qtask is the target of the Trustee's investigation, acceptance of Qtask's word as to which users and projects are responsive is equally problematic. As stated by the Trustee, "they cannot afford to get this wrong."

Report, page 12.

III. THE TRUSTEE REQUESTS SWIFT COURT RESOLUTION.

The actual prejudice and impact on the Estate and its creditors by Qtask's willful and continued noncompliance with this Court's many court orders is measurable. In economic terms, the Estate has already spent over \$100,000 in attorneys fees for rehashing and revisiting the same meritless arguments with Qtask for a one year period. The Trustee will shortly provide the Court with an updated attorneys fee and cost affidavit to liquidate these sums.

In non-economic terms (but which may well impact Estate recoveries), the Estate has not been able to conclude critical investigations. One example of actual, existing prejudice is the inability to conclude the Qtask Russell Adler ("Adler") data review and investigation where the Trustee has a specially set trial on Adler's adversary proceeding scheduled before Judge Cohn on February 14, 2011. The potential data being hidden by Qtask pertaining to Adler could be a pot of gold. The Trustee has already submitted to the Court the Scott Rothstein internal e-mail

where he directed his partners to use Qtask because the RRA servers were less than secure. In deposition, Adler makes no secret, in fact brags about being the RRA architect who brought Qtask in house to RRA. Robert Buschel ("Buschel"), a former RRA partner, Qtask shareholder and present Qtask lawyer has been the front man in keeping the Trustee away from Qtask's data during the last year. It is no coincidence that the deposition transcript that Buschel used to support his recent frivolous and bad faith motion to disqualify Berger Singerman was taken in the Adler adversary. To say Adler and Buschel are working in concert is not a stretch of imagination. What are they hiding?

But additionally, even after the appointment of Moody, Qtask and Buschel continued to hold firm and not comply with the Court's orders. There is no good reason why at any time since the Order to Compel or the Order of Contempt that Qtask couldn't have modified its position and provided compliance on such a simple matter as obeying a subpoena. What did Qtask ever have to gain by not complying? Perhaps even worse, the Expert Report makes clear that Moody spoke to Buschel and Qtask about all of the pending issues and both sides had a preview of where the Expert Report was heading. Instead, Qtask has continued to dig in its heels.

Based upon the record as it exists and the unique timing circumstances of the Trustee needing to promptly conclude all of his investigations, the Trustee asks the Court to **expedite** granting all of the following relief:

1. Holding a status conference or other hearing to set procedures for going forward based upon the Expert Report and the Trustee's requested relief set forth below.
2. Liquidating the accrued attorneys fees and the \$5000 per day non-compliance fine to a final judgment.

3. Increasing the \$5000 per day fine to \$25,000 per day for continued non-compliance.

4. Ordering the immediate incarceration of any Qtask officer who directed the contempt of court until full compliance by Qtask occurs.

5. Because it is cost and time effective to do so, appointing Moody as this Court's monitor with obligations to regularly report back to the Court on an extremely expedited basis.

6. Liquidating the amount of fees incurred by Moody for his work as the Court's expert and entering a judgment against Qtask for same.

7. Granting leave of court to the Trustee to file an appropriate motion to determine the culpability of Buschel in these proceedings, so as to potentially assess on a joint and several basis the total attorneys fee award and fine against Buschel and Qtask.

Dated: December 29, 2010.

Respectfully submitted,

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I HEREBY CERTIFY that a true and correct copy of the foregoing was served via Regular U.S. Mail, postage prepaid, fax, email and/or overnight delivery, as indicated, upon all parties on the attached Service List this 29th day of December, 2010.

/s/ Charles H. Lichtman
Charles H. Lichtman

NOT A CERTIFIED COPY

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