

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

**DEFENDANT BRADLEY J. EDWARDS RESPONSE TO PLAINTIFF'S REQUEST
FOR PRODUCTION DATED APRIL 12, 2010**

Defendant, BRADLEY J. EDWARDS, hereby files his Response to Request for
Production propounded by Plaintiff on April 12, 2010 as follows:

1. None.
2.
 - a. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
 - b. None.
3. Objection as to communications to or from investigators as that is protected by the work-product and /or attorney-client privilege.
4. Objection; any such communications are protected by the work-product and /or attorney-client privilege.
5. None.
6. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence; vague; overbroad, without waiving objection, there are no fee agreements with any investor.

FILED

2010 MAY 12 PM 3:21

SHARON R. BOON, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

7. None.
8. None.
9. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
10. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
11. None.
12. None.
13. None.
14. None.
15. None.
16. None.
17. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence; vague; overbroad, ambiguous.
18. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence.
19. Objection, relevance, not reasonably calculated to lead to the discovery of admissible evidence and protected by the work-product privilege.
20. Objection, vague overbroad and any and all such documents are protected by the work-product privilege.
21. Objection, vague overbroad and any and all such documents are protected by the work-product and attorney-client privilege.
22. Not yet determined.

- 23. Objection.
- 24. Objection; attorney-client privilege and/or work-product privilege.
- 25. None in Defendant's possession.
- 26. None.
- 27. None in Defendant's possession.

NOT A CERTIFIED COPY

Case No.: 502009CA040800XXXXMBAG
Edwards' Response to Request for Production dated 4/12/10

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been
furnished via U.S. Mail to all counsel on the attached list on ~~April~~ ^{FAX AND MAY 11th}, 2010.

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