

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S LIST OF TRIAL
EXHIBITS, TRIAL WITNESSES AND EXPERT WITNESSES**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his list of trial exhibits, trial witnesses, and expert witnesses pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures dated November 15, 2013 as follows:

TRIAL EXHIBITS

1. Information Charging Scott W. Rothstein in *United States of America v. Stott W. Rothstein*, 09-60331-CR-COHN; dated December 1, 2009.

2. Plea Agreement between *United States of America and Scott W. Rothstein*, 09-60331-CR-COHN, filed December 1, 2009.

3. Amended Complaint in *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943 (19).

4. All Depositions taken of Scott W. Rothstein in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR and any and all ancillary cases related thereto, including, but not limited to, *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, Case No. 09-062943(19).

5. The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012.

6. Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in *In re: Rothstein Rosenfeldt Adler, P.A.*; 09-34791-RBR.

7. Docket from *Doe v. United States*, 08-80736-CIV-MARRA.
8. Any and all exhibits listed and/or used by Bradley J. Edwards.
9. All Depositions taken of Bradley J. Edwards in the case and chief and the Counterclaim in this matter, via videotape or transcription, including all exhibits used/referenced therein.
10. All documents and exhibits provided by Bradley J. Edwards to date in this matter.
11. Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by Bradley J. Edwards, including all exhibits marked at said depositions.
12. All of Edwards's Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions.
13. Complaints and Docket from *L.M. v. Jeffrey Epstein*; 09-CV-81092-COHN; and 502008 CA 018051 XXXXMB.
14. Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein.
15. Subpoena to Leonard Baird.
16. Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.
17. Any and all exhibits/documents/pleadings referenced in Epstein's Motion for Summary Judgment as to Edwards's Counterclaim.
18. Deposition of Jack (John) Scarola dated July 2, 2013 taken in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR.
19. RRA Firm Directory dated October 23, 2009.

The Defendants reserve the right to produce any newly discovered evidence upon proper notice.

The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal.

The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice.

All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection at the offices of the undersigned at a mutually convenient time and date.

TRIAL WITNESSES

1. Scott W. Rothstein
c/o Marc Nurik, Esq.
Law Offices of Marc S. Nurik
One E. Broward Blvd., Suite 700
Ft. Lauderdale, FL 33301
2. Ken Jenne
c/o Broward Co. Sheriff Office
2601 W. Broward Blvd.
Ft. Lauderdale, FL 33312-1308
3. William Scherer
c/o Conrad & Scherer, LLP
PB Box 14723
Ft. Lauderdale, FL 33302-4723
4. Spencer Kuvin
c/o Law Office of Craig Goldenfarb, P.A.
2090 Palm Beach Lakes Blvd., Suite 402
West Palm Beach, FL 33409-6512
5. Katherine Ezell
c/o Podhurst Orseck PA
25 W. Flagler St.
Miami, FL 33130-1712
6. Ami Ederi
Miami-Dade State Attorney's Office
1350 NW12th Avenue
Miami, FL 33136-2102
7. Kikka Claudio
Address unknown at this time

8. Paul Cassell
Borton Petrini, LLP
1320 Columbia Street, Suite 210
San Diego, California 92101-3436

9. Margaret Berk
5925 Kaiser Lane
Pensacola, FL 32507-8319

10. Mercedes Estrada
Address unknown at this time

11. Jacquie Johnson
Address unknown at this time

12. Adam Horowitz
c/o Herman, Mermelstein & Horowitz, P.A.
3351 NW Boca Raton Blvd.
Boca Raton, FL 33431-6623

13. Stuart Mermelstein
c/o Herman, Mermelstein & Horowitz, P.A.
3351 NW Boca Raton Blvd.
Boca Raton, FL 33431-6623

14. Lisa Rivera
c/o U.S. Attorney's Office
110 9th Avenue, Suite A 961
Nashville, Tennessee 37203

15. Jack Kill
Address unknown at this time

16. Carolyn Edwards
Address unknown at this time

17. Robert Josefberg
Address unknown at this time

18. Richard Willits
Richard H. Willits, P.A.
490 Wandering Woods Way
Ponte Vedra, FL 32081-0619

19. William J. Berger

Weiss Handler & Cornwell PA
2255 Glades Road, Suite 218A
Boca Raton, FL 33431-7391
OR
Greenspoon Marder PA
100 W. Cypress Creek Road, Suite 700
Fort Lauderdale, FL 33309-2195

20. Bert Patton
Address unknown at this time
21. Susan K. Stirling
Promise Healthcare, Inc.
999 NW 51st Street
Boca Raton, FL 33431-4477
22. Iliana Yarzabal
Address unknown at this time
23. Barry Stone
6740 Chimere Terrace
Boynton Beach, FL 33437-6491
24. Allan Garten
U.S. Attorney's Office
1000 SW 3rd Avenue, Suite 600
Portland, Oregon 97204-2936
25. Elizabeth Kim
4855 Technology Way, Suite 630
Boca Raton, FL 33431-3351
26. Christina Fitch
Address unknown at this time
27. Gary Farmer
Farmer, Jaffe, Weissing, Edwards Fistros & Lerhman
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301-3268
28. Denis Kleinfeld
1001 Brickell Bay Drive, 32nd Floor
Miami, FL 34905
29. Steve Rossi, Esq.
533 NE 3rd Avenue, Suite 2

Fort Lauderdale, Florida 33301

30. Carl Linder
Linder Law Group
175 SW 7th Street, Suite 2410
Miami, FL 33130-2966
31. Cara Holmes
15751 Sheridan Street, PMB 129
Fort Lauderdale, FL 33331-3486
32. Jonathan Birkman
Quraishi & Birkman, PLLC
809 SE 8th Street
Deerfield Beach, FL 33441-5608
33. Robert C. Buschel
Buschel Gibbons, P.A.
100 SE Third Avenue, Suite 1300
Fort Lauderdale, FL 33394-0002
34. Beth Williamson
1306 Cormorant Road
Delray Beach, FL 33444-3328
35. Mike Fisten
Blue Line Investigations
13762 West State Road #84
Suite 421
Davie, Florida 33325
36. Josh Roberts
Kirschbaum, Birnbaum, Lippman, & Gregoire
1301 E. Broward Blvd., Suite 230
Fort Lauderdale, FL 33301-2111
37. Robin T. Kempner
Address unknown at this time
38. Pat Roberts
Address unknown at this time
39. Amy Swan
Address unknown at this time
40. Pat Diaz
Drug Enforcement Administration

2100 N. Commerce Parkway
Weston, FL 33326-3234

41. Jeffrey Sonn
Broward Financial Centre
500 E. Broward Blvd., Suite 700
Fort Lauderdale, FL 33394-3055
42. Tami Wolfe
Morrow, Milberg & Wolfe
499 NW 70th Avenue, Suite 108
Plantation, FL 33317-7572
43. Steven Jaffee
Farmer, Jaffe, Weissing, Edwards Fistros & Lerhman
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301-3268
44. Marc Nurik
c/o Marc Nurik, Esq.
Law Offices of Marc S. Nurik
One E. Broward Blvd., Suite 700
Ft. Lauderdale, FL 33301
45. Nora Batian
Address unknown at this time
46. Priscilla Nascimento
Address unknown at this time
47. Maribel Matiska
Address unknown at this time
48. Michael Wheeler
Department of Juvenile Justice
2737 Centerview Drive, Suite 3220
Tallahassee, FL 32399-0999
49. Bradley Berger
Address unknown at this time
50. Shawn Gilbert
Address unknown at this time
51. Ronald Wise
Address unknown at this time

52. Wayne Black
Address unknown at this time

53. Frank Preve
Banyon Funding, LLC
2455 E. Sunrise Blvd., Penthouse Suite

54. Kendall Coffey
Coffey Burlington PL
2699 S. Bayshore Dr., Penthouse
Miami, FL 33133-5408

55. Seth Lehrman
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301-3268

56. Phaedra Xanthos
Address unknown at this time

57. Scott Goldstein
Address unknown at this time

58. Alfredo Rodriguez (anticipated release date November 2013)
Federal Correctional Institution of Miami, Florida

59. Earleen Cote
Kubicki Draper
1 E. Broward Blvd., Suite 1600
Fort Lauderdale, FL 33301-1845

60. Ted Morse
Morse Operations
1240 N Federal Highway
Fort Lauderdale, FL 33304

61. Carolyn, Legal Assistant to Jay Howell, Co-Counsel
Jay Howell & Associates, PA
6444 Cesery Blvd., Suite 250
Jacksonville, FL 32211-3108

62. Jay Howell
Jay Howell & Associates, PA
6444 Cesery Blvd., Suite 250
Jacksonville, FL 32211-3108

63. Alan Sakowitz
1135 Kane Concourse, Floor 3
Bay Harbor Islands, FL 33154-2025

64. A. J. Discala
Canvas Financial, LLC
303 Park Avenue South, Suite 1401
New York, NY 10001-0646

65. Thane Ritchie
Address unknown at this time

66. Dean Kretschmar
Address unknown at this time

67. Michael Legamaro
Address unknown at this time

68. Debra Villegas
Address unknown at this time

69. George Levin
Address unknown at this time

70. Linda Von Allmen
Address unknown at this time

71. Bruce Zimet, Esq.
1 Financial Plaza
Suite 2612
Fort Lauderdale, FL 33301

72. Bradley J. Edwards
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301-3268

73. John Scarola, Esq.
Searcy Denney Scarola et al.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409

74. Jeffrey Epstein
c/o Tonja Haddad, PA

315 SE 7th Street
Suite 301
Fort Lauderdale, Florida 33301

75. Any and all witnesses listed by Bradley J. Edwards.
76. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards.

Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice.

Epstein reserves the right to call and/or produce any and all witnesses necessary for impeachment or rebuttal.

Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the Parties and this Court.

EXPERT WITNESSES

Unknown at this time, but Epstein will amend upon proper review of all documents and discovery in this matter and will properly provide the name and address of same as per the Trial Court's Order.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this January 6, 2014.

/s/ Tonja Haddad Coleman
Tonja Haddad Coleman, Esq.
Fla. Bar No.: 0176737
TONJA HADDAD, PA
315 SE 7th Street
Suite 301
Fort Lauderdale, Florida 33301
954.467.1223
954.337.3716 (facsimile)
Tonja@tonjahaddad.com

Electronic Service List

Jack Scarola, Esq.
Searcy Denney Scarola et al.
2139 Palm Beach Lakes Blvd.
West Palm Beach, FL 33409
JSX@SearcyLaw.com
MEP@Searcylaw.com

Jack Goldberger, Esq.
Atterbury, Goldberger, & Weiss, PA
250 Australian Ave. South
Suite 1400
West Palm Beach, FL 33401
jgoldberger@agwpa.com

Marc Nurik, Esq.
1 East Broward Blvd.
Suite 700
Fort Lauderdale, FL 33301
marc@nuriklaw.com

Bradley J. Edwards, Esq.
Farmer Jaffe Weissing Edwards Fistos Lehrman
425 N Andrews Avenue
Suite 2
Fort Lauderdale, Florida 33301
staff.efile@pathtojustice.com

Fred Haddad, Esq.
1 Financial Plaza
Suite 2612
Fort Lauderdale, FL 33301
Dee@FredHaddadLaw.com