

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

PART 8

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S APPENDIX OF
DOCUMENTS IN SUPPORT OF HIS REVISED OMNIBUS MOTION IN LIMINE**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") files this Appendix of Documents
in support of his revised Omnibus Motion in Limine:

No.	Date	Document
1	1/5/11	Epstein's Motion to Amend Complaint (D.E. 195)
2	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorneys from Revealing Provisions in the Agreement (D.E. 32); <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
3	4/17/09	Plaintiff's First Amended Complaint (D.E. 38) <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
4	4/30/09	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 148, 151-152); <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB

No.	Date	Document
5	6/19/09	Plaintiff's Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165); <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
6	11/5/09	Order Denying Plaintiff's Motion for Injunction, etc. (D.E. 400) <i>Jane Doe 2 v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 08-cv-80119-MARRA/JOHNSON
7	7/22/09	Letters from Edwards re depositions
8	7/27/09	Complaint (D.E. 1) <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
9	N/A	Court Docket <i>L.M. v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-81092-KAM
10	8/11/09 8/24/09	Re-Notices of Taking Videotaped Deposition of Donald Trump <i>Jane Doe v. Jeffrey Epstein</i> ; S.D. Fla. Case No. 9:08-cv-80893-KAM
11	8/10/09	Plaintiff's Request for Entry Upon Land (D.E. 143) <i>E.W. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028058-XXXX-MB
12	8/24/09	Epstein's Motion for Protective Order Regarding Depositions of Lawrence Visoski and David Hart Rogers (D.E. 159) <i>L.M. v. Jeffrey Epstein</i> ; 15 th Judicial Circuit Case No. 50-2008-CA-028051-XXXX-MB
13	11/3/09	Article: <u>South Florida Sun-Sentinel</u> - <i>Scott Rothstein's investment deals seemed too good to be true</i>
14	11/6/09	Article: <u>New Times Broward-Palm Beach</u> – <i>Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy</i>
15	11/9/09	Verified Complaint for Forfeiture <i>In Rem</i> (D.E. 1) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
16	11/12/09	Article: <u>South Florida Sun-Sentinel</u> – <i>FBI doubts Rothstein ran a Ponzi scheme alone</i>

No.	Date	Document
17	11/20/09	Complaint (without exhibits) (D.E. 3) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
18	11/23/09	Amended Verified Complaint for Forfeiture <i>In Rem</i> (D.E. 14) <i>United States of America v. Scott W. Rothstein</i> (Forfeiture Action); S.D. Fla. Case No. 0:09-CV-61780-WJZ
19	11/23/09	Article: <u>South Florida Sun-Sentinel</u> – <i>You’re in a town full of thieves</i>
20	11/24/09	Article: <u>The Miami Herald</u> – <i>Feds: Scott Rothstein Ponzi scheme paid salaries at law firm</i>
21	11/25/09	Amended Complaint (without exhibits) (D.E. 12) <i>Razorback Funding, LLC v. Rothstein</i> 17th Jud. Cir. Case No. 062009CA062943AXXXCE
22	12/1/09	Information (D.E. 1) <i>United States v. Rothstein</i> ; S.D. Fla. Case No. 0:09-cr-60331-JIC
23	12/7/09	Complaint (without exhibits) (D.E. 5)
24	6/30/17	Affidavit of Jeffrey Epstein (D.E. 931)
25	11/10/17	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 163-164, 166, 227-229, 259-260, 276-278, 321-322, 338-339)
26	3/23/10	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 112, 116-117, 123-125, 230-231)
27	10/10/13	Bradley J. Edwards’ Deposition Transcript Excerpts (pp. 205)
28	7/26/09 8/13/09 10/23/09	Email from Pricilla Nascimento to Scott Rothstein Email from Bradley J. Edwards to Priscilla Nascimento Email from Ken Jenne to Scott Rothstein
29	6/14/12	Scott Rothstein’s Deposition Transcript Excerpts (pp. 23-26, 52-53)

No.	Date	Document
30	12/12/11	Scott Rothstein's Deposition Transcript Excerpts (pp. 59-62); <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
31	12/21/11	Scott Rothstein's Deposition Transcript Excerpts (p. 2278) <i>Razorback Funding, LLC v. Rothstein</i> ; 17th Jud. Cir. Case No. 062009CA062943AXXXCE
32	3/17/10	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 13-14, 19-20, 23, 25-26, 28-34, 36-39, 48-55, 57, 59-60, 62-69, 73-74, 76-80, 83-88, 90-95, 116-123)
33	11/9/17	Edwards' Amended Exhibit List (D.E. 1043)
34	11/15/17	Epstein's Objections to Edwards' Amended Exhibit List (D.E. 1058)
35	11/9/17	Edwards' Seventh Amended and Supplemental Witness List (D.E. 1042)
36	1/25/12	Jeffrey Epstein's Deposition Transcript Excerpts (pp. 19-21)

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 21, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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APP. 32

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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,

Defendants.

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Wednesday, March 17, 2010
10:17 a.m. - 1:27 p.m.

303 Banyan Boulevard
Suite 400
West Palm Beach, Florida 33401

Reported By:
Sandra W. Townsend, FPR
Notary Public, State of Florida
West Palm Beach Office Job #1358

1 that question.
 2 BY MR. SCAROLA:
 3 Q. Have you ever acknowledged to --
 4 A. Excuse me.
 5 Q. -- Bradley --
 6 A. Sir, may I suggest that if I say I refuse to
 7 answer, that it means the Fifth, Sixth and 14th or would
 8 you prefer that I recite it each time?
 9 Q. I would prefer that you answer the questions,
 10 that's my preference. But if you're going to assert a
 11 privilege, I will assume that if you simply say that you
 12 are refusing to answer, your refusal to answer will be
 13 on the basis of various Constitutional privileges
 14 against self-incrimination without the necessity of
 15 specifying.
 16 If your refusal to answer is on the basis of
 17 any other privilege, it will be necessary for you to
 18 identify that privilege.
 19 A. Thank you.
 20 MR. PIKE: And I'm going to instruct you, too,
 21 when you do invoke, invoke the Fifth, Sixth and the
 22 14th.
 23 THE WITNESS: Yes.
 24 BY MR. SCAROLA:
 25 Q. Have you ever acknowledged in the presence of

1 Bradley J. Edwards that you knew the individual
 2 identified by the initials L.M.?
 3 A. I'm going to have to refuse to answer that
 4 question.
 5 Q. Have you ever acknowledged in the presence of
 6 Bradley J. Edwards that you knew L.M.?
 7 MR. PIKE: Again, for purposes of the record,
 8 I'm instructing you to invoke the Fifth, Sixth and
 9 14th, rather than just simply say --
 10 THE WITNESS: Okay.
 11 MR. PIKE: -- I refuse to answer. I want it
 12 to be clear for the Court that you have invoked
 13 your Fifth, Sixth and 14th.
 14 THE WITNESS: Fine.
 15 Then on advice of Counsel, I'm going to have
 16 to invoke my Fifth, Sixth and 14th Amendment Right.
 17 BY MR. SCAROLA:
 18 Q. Have you ever acknowledged in Brad Edwards'
 19 presence that you liked the individual identified by the
 20 initials L.M.?
 21 A. Again, I'm going to have to invoke my Fifth,
 22 Sixth and 14th Amendment Right, Mr. Scarola.
 23 Q. Have you ever acknowledged in Bradley Edwards'
 24 presence that you liked L.M.?
 25 A. Again, Mr. Scarola, I'm going to have to

1 invoke my Fifth, Sixth and 14th Amendment Right.
 2 Q. Have you ever acknowledged in the presence of
 3 Terri Becker, a court reporter present at a deposition
 4 taken by Brad Edwards in a -- in a case in which the
 5 individual identified by the initials L.M. was a
 6 Plaintiff that you knew and/or liked --
 7 MR. PIKE: Form.
 8 THE WITNESS: Again, --
 9 BY MR. SCAROLA:
 10 Q. -- L.M.?
 11 MR. PIKE: Same objection.
 12 THE WITNESS: Again, I'm going to have to
 13 assert my Fifth, Sixth and 14th Amendment Right.
 14 BY MR. SCAROLA:
 15 Q. Have you ever acknowledged in the presence of
 16 Steve Jaffe that you knew and/or liked L.M.?
 17 A. Again, Mr. Scarola, though I'd like to answer
 18 each and every one of your questions today, I'm going to
 19 have to, at the advice of Counsel, invoke my Fifth,
 20 Sixth and 14th Amendment Right.
 21 Q. Why are you suing L.M.?
 22 MR. PIKE: Form.
 23 MR. SCAROLA: Let me state for the record that
 24 I don't consider a form objection to be a proper
 25 objection, unless you specify the defect in the

1 form and provide me with an opportunity to correct
 2 the defect.
 3 MR. PIKE: That's fine. I believe the rules
 4 provide otherwise. But, nonetheless, I stand on my
 5 objection to form.
 6 THE WITNESS: I'm sorry. You have to repeat
 7 the question.
 8 BY MR. SCAROLA:
 9 Q. (Why are you suing L.M.?)
 10 MR. PIKE: Form.
 11 (THE WITNESS: L.M. is part of a conspiracy
 12 with Scott Rothstein, Bradley Edwards, creating --
 13 excuse me -- creating fraudulent cases of a
 14 sexually charged nature in which the U.S. Attorney
 15 has already charged the firm of Rothstein, a firm
 16 of which Bradley Edwards is a partner, was a
 17 partner, with creating, fabricating malicious cases
 18 of a sexual nature, including cases with respect to
 19 me, specifically, in order to fleece unsuspecting
 20 investors in South Florida out of millions of
 21 dollars.)
 22 BY MR. SCAROLA:
 23 Q. (What role do you contend L.M. played in that
 24 conspiracy to create fraudulent cases?)
 25 A. (L.M.'s testimony before she met Mr. Edwards

1 was dramatically -- sworn testimony to the FBI was
 2 dramatically different after she came in contact with
 3 Mr. Bradley Edwards, where her testimony then changed to
 4 sort of a hostile and had claims of -- claims never made
 5 before, never made to anyone before, and allegations
 6 that I've read in her Complaint that that had been
 7 dramatically different from the ones she had spoken to
 8 the FBI about, sir.

9 Q. Is it your contention that L.M.'s statement to
 10 the FBI was true?

11 MR. PIKE: Form.

12 THE WITNESS: Mr. Scarola, unfortunately,
 13 today with respect to that question, I'm going to
 14 have to assert my Fifth, Sixth and 14th Amendment
 15 Right. Though I know -- I believe you know the
 16 answer to that question, I can't answer the
 17 question under advice of Counsel. And he's told me
 18 if I chose to do so, I risk losing his
 19 representation.

20 BY MR. SCAROLA:

21 Q. What is the basis of your belief that I know
 22 the answer to the question?

23 MR. PIKE: Form.

24 THE WITNESS: You -- I believe you have seen
 25 this, because you're supposed to be a decent

1 lawyer, you've read the testimony. I would guess
 2 you've read the difference in her testimony to the
 3 FBI versus her testimony after she's met your
 4 client and his partners, who are currently in jail.

5 BY MR. SCAROLA:

6 Q. How does that respond to my question as to
 7 whether you contend that her testimony to the FBI was
 8 true or false?

9 MR. PIKE: Form.

10 THE WITNESS: I don't believe that was your
 11 question. Will you repeat?

12 BY MR. SCAROLA:

13 Q. Okay. Well, let's -- let me rephrase the
 14 question then.

15 Is it your contention that L.M.'s statement to
 16 the FBI was true?

17 A. Sir, on advice of Counsel, at least today, I'm
 18 going to have to assert my Fifth, Sixth and 14th
 19 Amendment Right.

20 Q. Was L.M.'s statement to the FBI false in any
 21 respect?

22 A. Sir, at least, again, today, on advice of
 23 Counsel, I'm going to have to assert my Fifth, Sixth and
 24 14th Amendment Right.

25 Q. Was L.M.'s subsequent testimony after,

1 according to you, she met Mr. Edwards and changed her
 2 testimony, true?

3 A. Did she change her testimony? Is that -- yes,
 4 her testimony was changed.

5 Q. My question to you is: Was her testimony
 6 which you contend was changed true testimony?

7 A. Your question is not a good question. Is it
 8 her testimony before or after?

9 Q. Was the subsequent testimony given by L.M.
 10 after she met Mr. Edwards which you contend was
 11 different from her testimony before the FBI, was the
 12 subsequent testimony true or false?

13 MR. PIKE: Form.

14 THE WITNESS: Sir, I'm going, at least today,
 15 I'm going to have to assert my Fifth, Sixth and
 16 14th Amendment Right.

17 BY MR. SCAROLA:

18 Q. Did you ever engage in any sexual conduct with
 19 L.M.?

20 A. I would like to answer that question, but --

21 Q. You don't need to tell me what you'd like to
 22 do, Mr. Epstein. You just need to do it, please.

23 THE WITNESS: Please --

24 MR. PIKE: Mr. Scarola, please let the witness
 25 finish his response.

1 MR. SCAROLA: That's not a response to my
 2 question.

3 MR. PIKE: In your mind it may not be a
 4 response. In a Judge's mind, it may be. We may
 5 have to certify it to the Court. If such a
 6 procedure even exists, we can take it up with the
 7 Court. But please let the witness finish his
 8 response.

9 THE WITNESS: Again, please?

10 BY MR. SCAROLA:

11 Q. Did you engage -- ever engage in any sexual
 12 conduct with L.M.?

13 A. I would like to answer that question; however,
 14 today I'm going to have to assert my rights as provided
 15 by the Fifth, Sixth and 14th Amendment to that question,
 16 sir.

17 Q. Have you ever exchanged anything of value with
 18 L.M.?

19 MR. PIKE: Form.

20 THE WITNESS: At least today, I'm going to
 21 have to assert my Fifth, Sixth and 14th Amendment
 22 Right, sir.

23 BY MR. SCAROLA:

24 Q. Did you ever direct anyone to deliver anything
 25 of value to L.M.?

MR. PIKE: Form.

THE WITNESS: At least today, I'm going to have to refuse to answer that question based on the Fifth, Sixth and 14th Amendment.

BY MR. SCAROLA:

Q. Do you know Carolyn Andriano?

A. At least today, sir, I'm going to have to refuse to testify about that question. Based on advice of Counsel, I'm going to have to assert my Fifth, Sixth and 14th Amendment Right.

Q. Did Carolyn Andriano introduce you to L.M.?

A. Sir, respectfully, I'd like to answer that question today. As I said, I'd like to answer each and every one of your questions. However, on advice of my Counsel today, I'm going to have to assert my Fifth, Sixth and 14th Amendment Right.

Q. Did L.M. suffer any damage as a consequence of any interaction between you and L.M.?

MR. PIKE: Form.

THE WITNESS: Could you repeat the question, please?

BY MR. SCAROLA:

Q. Did L.M. suffer any damage as a consequence of any interaction between you and L.M.?

MR. PIKE: Form.

THE WITNESS: I'd like to answer each and every one of your questions here today, Mr. Scarola; however, on advice of Counsel, today, I'm going to have to assert my Fifth, Sixth and 14th Amendment Right.

BY MR. SCAROLA:

Q. Your Complaint in this action alleges that L.M. made claims for damages out of proportion to her alleged damages. What does that mean?

A. It means what it says.

Q. I don't understand it. Explain it to me.

MR. PIKE: To the extent you can answer that question without disclosing my conversations with you or Mr. Critton's conversations with you, as well as my work product, you can answer the question.

THE WITNESS: I believe that as part of the scheme to defraud investors in South Florida out of millions of dollars, claims of outrageous sums of money were made on behalf of alleged victims across the board. And the only way -- in fact, Scott Rothstein sits in jail. And what I've read in the paper, claims that I've settled cases for \$200-million, which is totally not true.

(She has made claims of serious sum of money,

(which is outrageous.

BY MR. SCAROLA:

Q. How much have you settled claims for?

MR. PIKE: I'm going to instruct you not to answer that question.

MR. SCAROLA: And the basis of that instruction is?

MR. PIKE: Confidential settlement agreements, to the extent that they exist. And the terms would be confidential.

BY MR. SCAROLA:

Q. Have you settled claims?

A. Yes, I have.

Q. What is the nature of the claims you settled?

MR. PIKE: I'm going to instruct you not to answer that question.

BY MR. SCAROLA:

Q. How many claims have you settled?

MR. PIKE: I'm going to instruct you not to answer that question as well.

MR. SCAROLA: What is the basis for those instructions?

MR. PIKE: Confidential, as well as there is a Victim's Right Statute that may -- you may be tiptoeing into the identity of --

MR. SCAROLA: I'm not tiptoeing anywhere.

MR. PIKE: Let me finish my objection, Mr. Scarola.

You may be tiptoeing into the identity of various alleged victims underneath the Victims Right Statute, as well as ongoing investigations or past investigations that have remained open with the State, as well as the Federal Government.

So in that regard, we would have to put the State Attorney, as well as the Federal Government on notice that you were seeking to potentially back door certain identities at this deposition.

BY MR. SCAROLA:

Q. Other than having allegedly given different testimony before she met Mr. Edwards then given after she met Mr. Edwards, did L.M. do anything else that forms the basis for your claim against her?

MR. PIKE: Form. Asked and answered.

THE WITNESS: I'd like to answer that question, as well as every one of your questions with respect to L.M. here today; however, on advice of Counsel, at least today, Mr. Scarola, I'm going to have to assert my Sixth Amendment, Fifth Amendment and 14th Amendment Right.

BY MR. SCAROLA:

1 Q. Did L.M. fail to do anything that she had an
2 obligation, duty or responsibility to do --

3 MR. PIKE: Form.

4 BY MR. SCAROLA:

5 Q. -- that forms the basis for your claim against
6 her?

7 MR. PIKE: I apologize. Form.

8 THE WITNESS: Again? I'm sorry. Has she
9 failed to do? Can you repeat?

10 BY MR. SCAROLA:

11 Q. Yes, sir. Lawsuits are generally based, civil
12 lawsuits are generally based on a claim that someone has
13 done something that they shouldn't have done or failed
14 to do something that they should have done.

15 I asked you whether L.M. did anything that she
16 shouldn't have done and you asserted a Fifth Amendment
17 privilege in refusing to answer that question.

18 I'm now attempting to find out whether L.M.
19 failed to do something that she should have done that
20 forms the basis of your claims against her.

21 Did L.M. do anything that she should have done
22 that forms the basis of your claims against her?

23 MR. PIKE: Form.

24 THE WITNESS: On advice of Counsel, at least
25 today, Mr. Scarola, I'm going to have to refuse to

1 MR. PIKE: Mr. Scarola, that's the second time
2 that I'm going to ask you not to interrupt the
3 witness when he's giving a response. He is giving
4 a response. When he finishes his response, you can
5 go on with your next question or you can -- you can
6 elicit any sort of information you intend to elicit
7 from the witness.

8 MR. SCAROLA: He's being unresponsive.

9 MR. PIKE: No, that's your contention.

10 MR. SCAROLA: No, that's a fact.

11 MR. PIKE: And you can take it up with a
12 Judge. And if we want to continue going back and
13 forth and bantering, not allowing the witness to
14 answer the question -- we're here for you today,
15 for you to ask the questions and for you to get
16 answers. But if you continue to banter with the
17 witness and interrupt the witness, I will adjourn
18 the deposition. This is not proper and we
19 certainly can take it up with the Judge. So that's
20 the second warning, Mr. Scarola. Please --

21 MR. SCAROLA: How many do I get?

22 MR. PIKE: I'm not sure yet today.

23 MR. SCAROLA: Okay.

24 MR. PIKE: Okay?

25 MR. SCAROLA: Good. Then let's move on.

1 answer that question based on my Fifth Amendment,
2 Sixth Amendment and 14th Amendment Right.

3 BY MR. SCAROLA:

4 Q. (Did Brad Edwards do anything that he shouldn't
5 (have done that forms the basis of your lawsuit against
6 him?)

7 MR. PIKE: Form.

8 (THE WITNESS: Yes, many things.)

9 BY MR. SCAROLA:

10 Q. (List them for me, please,

11 (A. He has -- he has gone to the media out of, I
12 (believe, in an attempt to gin up these allegations. He
13 (has contacted the media. He has used the media for his
14 (own purposes. He has brought discovery -- he has
15 (engaged in discovery proceedings that bear no
16 (relationship to any case filed against me by any of his
17 (clients.

18 (His firm, which he's the partner of, has been
19 (accused of forging a Federal Judge's signature.

20 Q. I want to know what Mr. Edwards --

21 MR. PIKE: One second.

22 THE WITNESS: Excuse me. I'm answering.

23 BY MR. SCAROLA:

24 Q. I want to know what Mr. Edwards did. I'm not
25 asking you about allegations concerning his law firm.

1 MR. PIKE: But I can tell you one thing: On a
2 professional nature, just because you are
3 interrupting the witness and bantering with me, I
4 will adjourn the deposition.

5 BY MR. SCAROLA:

6 (Q. Besides having gone to the media in an attempt
7 (to, quote, gin up, unquote, these allegations and
8 (engaged in what you contend to be irrelevant discovery
9 (proceedings, what else did Mr. Edwards, personally, do
10 (that forms the basis for this lawsuit?)

11 (A. Mr. Edwards, personally, engaged with his
12 (partners, Scott Rothstein, who sits in a Federal jail
13 (cell, potentially for the rest of his life, he shared
14 (information, what I've been told and -- excuse me --
15 (what I've read in the newspapers, 13 boxes of)
16 (information that had my name on it, with other attorneys
17 (at his firm.)

18 (He counseled his clients to maintain a
19 (position alleging multi-million dollar damages in order
20 (for them to scam local investors out of millions of)
21 (dollars.)

22 (He and his -- many of his other partners
23 (already under investigation by the FBI and the U.S.)
24 (Attorney have been accused by the U.S. Attorney of
25 (running a criminal enterprise.)

Q. (Anything else?)

MR. PIKE: Form.

THE WITNESS: (Not I can think of at the

moment.

BY MR. SCAROLA:

Q. (Okay. What media did Mr. Edwards go to?

(A. I am aware of at least the Daily News in New
York City.)

(I have been told by other people that there
were other media, local media.)

(I've been told that the -- his investigator
was sent to California to harass people representing
his -- Brad Edwards' investigator -- representing
(fictitiously, fraudulently that he was a FBI agent to
try to gather information for Mr. Edwards' claims.)

Q. Does that have something to do with going to the media?

MR. PIKE: Form.

THE WITNESS: I've answered your question.

BY MR. SCAROLA:

Q. Does the investigator going to California to do something have something to do with the media?

A. I believe I've also told that you that he's gone to the Daily News, sir; is that correct?

MR. PIKE: Form. Mischaracterizes the

witness' testimony as well.

BY MR. SCAROLA:

Q. Do you understand the question that you're supposed to be answering?

MR. PIKE: Well, let's go ahead and repeat it.

MR. SCAROLA: No, let's get an -- let's get an answer to that question.

BY MR. SCAROLA:

Q. Do you understand the question you're supposed to be answering?

A. When --

MR. PIKE: I'm confused. Wait one second.

THE WITNESS: Sorry.

MR. PIKE: I'm confused as to what question is on the table.

MR. SCAROLA: And when your deposition is being taken, your confusion is relevant and material.

MR. PIKE: Right. And it's --

MR. SCAROLA: When Mr. Edwards' -- excuse me -- when Mr. Epstein's deposition is being taken, I'm concerned with whether he understands the question being asked.

MR. PIKE: Right. So...

BY MR. SCAROLA:

Q. Do you understand the question you're supposed to be answering, Mr. Epstein?

MR. PIKE: And I'm going to instruct you not to answer that question right now because as your Counsel I cannot let you answer that question until I understand what question is on the table.

There's been a lot of bantering back and forth, so, Mr. Scarola, if you would respectfully repeat the question and then you may be able to ask him whether or not he understands the question. But I cannot allow him to answer a question that I don't understand is on the table.

BY MR. SCAROLA:

(Q. (What does an investigator going to California
have to do with Mr. Edwards allegedly going to the media
in an attempt to, quote, gin up, unquote, these
allegations?)

MR. PIKE: Please answer the question.

(THE WITNESS: Good. It's part of Mr. Edwards'
scheme to involve people who have nothing to do
with any of his cases in order to, in fact, go back
to the media and gin up his stories and make false
allegations of people that have sexually charged
nature cases in order to attempt to fleece
investors, local investors out of millions of

(dollars.)

(His firm has been accused by the U.S. Attorney
of manipulating the media, by hiring investigators,
by illegal wire taps, by illegal methods of
eavesdropping in order to go to the media and
generate cases.)

BY MR. SCAROLA:

(Q. (When did Mr. Edwards go to the Daily News?)

(A. I don't know.)

(Q. (How did he go to the Daily News?)

(A. I don't know.)

(Q. What did he say to the Daily News?)

(A. I believe Mr. Edwards knows that. I don't
know exactly what he said.)

(Q. What is the source of your information that he
went to the Daily News at all, ever?)

MR. PIKE: To the extent you can answer that question without violating any attorney/client privileges, you can answer the questions.

(THE WITNESS: It's attorney/client.)

BY MR. SCAROLA:

(Q. You said you were told by other people that he
went to other media representatives?)

(A. Yes, sir.)

(Q. Who are the other people that told you that?)

1 A. I don't recall at the moment.

2 Q. What did these other people who you don't
3 remember tell you Mr. Edwards did with respect to other
4 media representatives besides the Daily News?

5 A. Again, the question again?

6 Q. What did these other people tell you
7 Mr. Edwards did with respect to going to other media?

8 MR. PIKE: Form.

9 THE WITNESS: Mr. Edwards went to the media to

10 gin up his cases in order that the Rothstein firm

11 could generate profits, falsely taking in

12 investors, creating false stories to the local

13 medias and making statements to local press

14 regarding false claims made by his clients in order

15 that Scott Rothstein, who currently sits in jail,

16 could defraud, along with his other partners of his

17 firm, local Florida investors, Mr. Scarola, out of

18 millions of dollars.

19 BY MR. SCAROLA:

20 Q. When did these other people whose identity you
21 can't remember tell you these things that Brad Edwards
22 did?

23 A. Sometime in the past year.

24 Q. How many other people were there who told you
25 these things about Mr. Edwards?

1 A. I don't recall with specificity.

2 Q. Well, do you recall in any degree how many
3 there were?

4 A. I would say, probably five to ten.

5 Q. Where were you when these conversations took
6 place that you can't -- the identity of whose
7 participants you can't remember?

8 MR. PIKE: So we're clear, within the last

9 year, correct? -- timewise?

10 MR. SCAROLA: Well, that's what your client

11 said. I don't believe a word he says, but that's

12 what he said.

13 MR. PIKE: Form. Objection. Overbroad.

14 THE WITNESS: Again, sir?

15 BY MR. SCAROLA:

16 Q. Yes, sir. Where did these conversations with
17 these five to ten people take place whose identity you
18 can't remember?

19 MR. PIKE: Form.

20 THE WITNESS: On the telephone.

21 BY MR. SCAROLA:

22 Q. Who initiated the phone calls?

23 A. Sir, these questions, I have no -- I don't
24 have any recollection.

25 Q. Did the people who were on the phone identify

1 themselves or were these anonymous callers?

2 MR. PIKE: Form.

3 THE WITNESS: Sitting here today, Mr. Scarola,

4 I don't recall with specificity.

5 BY MR. SCAROLA:

6 Q. What specifically did Mr. Edwards allegedly
7 communicate to the Daily News to, quote, gin up these
8 allegations, unquote?

9 A. The newspapers have quoted Mr. Edwards -- not
10 quoted Mr. -- newspapers have made allegations referred
11 to as Mr. Edwards' statements.

12 MR. SCAROLA: Would you read the question
13 back, please, Sandy?

14 (Pending question was read.)

15 MR. PIKE: Did he answer your question?

16 MR. SCAROLA: No.

17 MR. PIKE: Are you asking him again?

18 THE WITNESS: So you're asking the question
19 again?

20 BY MR. SCAROLA:

21 Q. Yes.

22 THE WITNESS: Sorry. Could you repeat the
23 question again?

24 (Pending question was read.)

25 THE WITNESS: He alleged that third parties

1 had already been involved in some allegations to do
2 with sexual misconduct.

3 BY MR. SCAROLA:

4 Q. Which third parties?

5 A. I don't recall sitting here today.

6 Q. Involved how?

7 MR. PIKE: Form.

8 THE WITNESS: If I recall with specificity, if
9 I had the articles in front of me, I would be able
10 to recall. Maybe next time.

11 BY MR. SCAROLA:

12 Q. What does "gin up these allegations" mean?

13 MR. PIKE: Form.

14 THE WITNESS: It means craft allegations of
15 multi-million dollar cases; in fact, alleging in
16 L.M.'s case damages of \$50-million, settlements in
17 order for Scott Rothstein and the rest of
18 Mr. Edwards' partners to fleece unsuspecting
19 investors out of millions and millions of dollars
20 based on cases that didn't exist or alleged cases
21 that I had settled.

22 Can I take a break?

23 VIDEOGRAPHER: Going off video record, 10:50.

24 (Brief recess.)

25 VIDEOGRAPHER: We're now on video record at

10:57 a.m.

BY MR. SCAROLA:

(Q. Was your reference to, quote, gin up these allegations, unquote, a reference to allegations made against you?)

MR. PIKE: Form.

(THE WITNESS: As part of the vast conspiracy of the Rothstein firm and Mr. Edwards' participation in it, it has been alleged that many cases were fraudulently brought -- alleged that have been brought; ginned up, meaning, crafted; multi-million dollar numbers put on cases in order to fleece investors, where his partner, Scott Rothstein, currently sits in jail for just those purposes, Mr. Scarola.)

BY MR. SCAROLA:

Q. (My question to you is: Did the reference to, quote, gin up these allegations refer to allegations against you?)

A. (Reported in the newspaper the answer is, yes. And others, but specifically me, yes, by the newspaper reports.)

Q. Specifically what are the allegations against you which you contend Mr. Edwards ginned up?

A. I would like to answer that question. A, many

of the files and documents that we've requested from Mr. Edwards and the Rothstein firm are still unavailable.

With respect to anything that I can point to today, I'm, unfortunately, going to have to take the Fifth Amendment on that, Sixth and 14th.

Q. You seemed to be defining ginned up as crafted; is that correct?

A. That's correct.

Q. Does ginned up or crafted mean fabricated?

MR. PIKE: Form.

THE WITNESS: I'm sorry, Mr. Scarola. I understand that you are trying to back door your way into a waiver of my Fifth Amendment. But respect to that question, I'm going to have assert my Fifth Amendment, Sixth Amendment and 14th Amendment Right.

BY MR. SCAROLA:

Q. So you are asserting your Fifth Amendment, Sixth Amendment and 14th Amendment Right to remain silent about what you mean when you use the words "gin up" and "crafted;" is that correct?

A. I don't believe that was your question.

Q. Yes, sir, that's exactly my question.

A. Would you repeat the question for me?

Q. I want to know whether when you use the phrase "gin up" and the word "crafted," which you have told us is synonymous with gin up, --

A. Yes.

Q. -- you mean fabricated?

A. I'm sorry. On advice of Counsel, sir, and I've answered that question before, but if you didn't hear me the first time, I must assert my Fifth, Sixth and 14th Amendment Right.

Q. (What specific discovery proceedings did Mr. Edwards engage in which you contend form the basis for your lawsuit?)

A. The discovery proceedings of bringing my attorneys to various people that had nothing to do with any of his clients or these lawsuits.

Q. Which various people? Who?

MR. PIKE: Form.

(THE WITNESS: For example, he tried to depose Bill Clinton, strictly as a means of getting publicity so that he and his firm could fraudulently steal, craft money from unsuspecting investors in South Florida out of millions of dollars.)

BY MR. SCAROLA:

Q. Who else besides Bill Clinton is included in

your reference to various people?

A. There are people in California. There are people in New York.

Q. Would you name them for us, please?

A. I'm sorry. Sitting here today, Mr. Scarola, I'm going to have to assert my Fifth Amendment, Sixth Amendment and 14th Amendment Right.

Q. Let's then talk about Bill Clinton, by whom I assume you mean former President Clinton; is that correct?

A. That's correct.

Q. All right. Do you know former President Clinton personally?

A. I'm sorry. As I sit here today, though I'd like to answer that question, on advice of my Counsel, at least today, I'm going to have to take the Fifth, Sixth and 14th Amendment.

(Q. You said something about Mr. Edwards sharing 13 boxes of information with somebody --)

(A. Yes.)

(Q. -- as forming part of the basis for your lawsuit against Mr. Edwards, correct?)

(A. Correct.)

(Q. All right. With whom did Mr. Edwards share these 13 boxes of information?)

1 A. (It has been reported in the Scherer Complaint
 2 that he shared those boxes with the partners of his firm
 3 that was then formally accused by the U.S. Attorney,
 4 sir, of being a criminal enterprise.

5 MR. PIKE: And just for purposes --

6 BY MR. SCAROLA:

7 Q. (Do you remember my question?

8 A. You asked me who he shared it with?

9 Q. (Yes.

10 A. The partners of his firm, sir.

11 Q. Okay. So part of the basis of your lawsuit is
 12 that Mr. Edwards allowed members of his own law firm to
 13 see 13 boxes of information; is that correct?

14 A. No, that's not correct. My claim is that the
 15 13 boxes of information that were shown to investors by
 16 Mr. Edwards' partners, 13 boxes that we've been told by
 17 the press contain multiple cases, fraudulently -- and if
 18 you like the word -- fabricated in order to fleece
 19 investors out of money. The 13 boxes were shared with
 20 investors, Mr. Edwards, Mr. Edwards' partners and some
 21 of those partners currently under indictment, the others
 22 already sitting in jail.

23 Q. I had asked you earlier whether ginned up and
 24 crafted meant fabricated and you asserted your Fifth
 25 Amendment privilege.

1 Are you now telling us that there were claims
 2 against you that were fabricated by Mr. Edwards?

3 A. I'm going to again assert my Fifth, Sixth and
 4 14th Amendment Right, sir.

5 I would respond that the newspapers are very
 6 clear that the cases were fabricated.

7 Q. (Which newspaper said which case was
 8 fabricated?

9 A. (Bob Norman's blog said most of the cases were
 10 fabricated, to my best recollection.

11 (The Scherer Complaint alleged many fabricated
 12 cases, sir.)

13 Q. Well, which of Mr. Edwards' cases do you
 14 contend were fabricated?

15 A. Again, we've requested most of the --
 16 information from the bankruptcy trustee. We've been
 17 unable -- Mr. Edwards has not given us the total file,
 18 but respect to any individual, I would have -- at the
 19 moment I would have to assert my Fifth, Sixth and 14th
 20 Amendment claim, sir.

21 Q. So you will not answer questions about whether
 22 the claim on behalf of L.M. was fabricated; is that
 23 correct?

24 A. I believe I've already answered that, but, if
 25 again, I'll have to assert my Fifth, Sixth and 14th

1 Amendment Right, sir.

2 Q. Your Complaint also makes reference to a claim
 3 on behalf of Jane Doe, referred to as Jane Doe versus
 4 Epstein, case number 08-CIV-80893, a case pending in the
 5 United States District Court for the Southern District
 6 of Florida.

7 Is it your contention that the claim on behalf
 8 of Jane Doe is a fabricated claim?

9 A. Sir, though I'd like to answer that question,
 10 as well as every one of your other questions here today,
 11 today I'm going to have to assert my rights as under the
 12 Constitution of the Fifth, Sixth and 14th Amendment.

13 Q. Do you know the real name of the person
 14 referred to as Jane Doe in that case?

15 A. I don't know which -- I'm sorry, sir. I do
 16 not, sitting here today.

17 Q. Did you ever have personal contact with the
 18 person referred to by the name Jane Doe in that lawsuit?

19 A. I'm sorry, sir. Sitting here today, I'm going
 20 to have to assert my Fifth, Sixth and 14th Amendment
 21 Right.

22 Q. When did you first meet the person referred to
 23 as Jane Doe?

24 A. Sir, though I'd like to answer each and every
 25 one of your questions here today, at least with respect

1 to that question, I'm going to have to assert my rights
 2 under the Sixth Amendment, 14th Amendment and Fifth
 3 Amendment.

4 Q. Where did you first meet the person referred
 5 to as Jane Doe?

6 A. Sir, though I'd like to answer that question
 7 here today, at least today on advice of Counsel, I'm
 8 going to have to assert my Fifth Amendment, Sixth
 9 Amendment and 14th Amendment Right.

10 Q. How many times have you been in the physical
 11 presence of the person referred to as Jane Doe?

12 A. The person referred to as Jane Doe?

13 Q. Yeah. How many times have you been in her
 14 physical presence?

15 MR. PIKE: Form.

16 THE WITNESS: At least -- at least sitting
 17 here today, Mr. Scarola, I'm going to have to
 18 assert my Fifth Amendment, Sixth Amendment and 14th
 19 Amendment Right.

20 BY MR. SCAROLA:

21 Q. Did you ever have any physical contact with
 22 Jane Doe?

23 MR. PIKE: Form.

24 THE WITNESS: Now, for this purposes, you're
 25 assuming this Jane Doe is somebody I know? I don't

1 Q. Would your answer be the same with regard to
2 L.M. and to Jane Doe?

3 MR. PIKE: I'm going to instruct you if your
4 answer is the same, to invoke in full.

5 THE WITNESS: With respect to, I believe, Jane
6 Doe -- and who is the other person? I'm sorry.
7 BY MR. SCAROLA:

8 Q. L.M.

9 A. L.M. Though I'd like to answer your claims
10 with respect to all three of Mr. Edwards' clients, on
11 advice of Counsel, at least today, I'm going to have to
12 invoke my Fifth, Sixth and 14th Amendment Rights.
13 Though I'd prefer to answer the question, I've been told
14 that if I choose to do so, I risk losing their
15 representation.

16 Q. Among those items listed by you as wrongdoing
17 on the part of Mr. Edwards forming the basis for this
18 lawsuit is that he, quote, counseled his clients to make
19 multi-million dollar claims against you; is that
20 correct?

21 MR. PIKE: Form. Document speaks for itself.

22 THE WITNESS: Document speaks for itself.

23 BY MR. SCAROLA:

24 Q. I'm not asking about a document. I'm asking
25 you about the list of wrongdoing that you gave us during

1 the course of this deposition, which you allege form the
2 basis for your claim against Mr. Edwards.

3 Is it your contention that among those things
4 Mr. Edwards did that form the basis for your lawsuit is
5 to have counseled his clients to make multi-million
6 dollar claims against you?

7 MR. PIKE: Form.

8 THE WITNESS: What the newspapers have said is
9 that the claims purported to have been made by the
10 Rothstein firm and its partners allege
11 multi-million dollar claims where no claims exist.

12 However, respect specifically to my claim
13 today, I'm going to have assert my Fifth, Sixth and
14 14th Amendment Right.

15 MR. PIKE: Also, the question mischaracterizes
16 the witness' testimony.

17 BY MR. SCAROLA:

18 Q. By whom was Bradley Edwards employed when he
19 initiated litigation against you?

20 A. I would like to know the answer to that
21 question.

22 Q. So the answer to that question is, I don't
23 know?

24 A. I would like --

25 Q. Correct?

1 A. No. I answered that question, which is, I'd
2 like to know.

3 Q. Yes. But that isn't an answer to my question.

4 My question is: By whom was Mr. Edwards
5 employed at the time that he initiated litigation
6 against you? Do you know the answer to that question?

7 A. I'd have no way of knowing the answer to that
8 question, sir.

9 Q. (Among the allegations of wrongdoing against
10 Mr. Edwards which you contend form the basis of this
11 lawsuit is something having to do with sending an
12 investigator to California.

13 (Would you tell me, please, more specifically
14 what it is that Mr. Edwards did with regard to sending
15 an investigator to California which you contend
16 justifies a legal claim against Mr. Edwards.)

17 MR. PIKE: Form. And also mischaracterizes
18 the witness' testimony.

19 (THE WITNESS: Reported widely in the
20 newspapers is the use of illegal activities, wire
21 taps, and methods by the Rothstein firm while
22 Mr. Edwards had basically been bringing these
23 cases)

24 (The investigator, Mr. Fisten, who's mentioned
25 in the Complaint, represented himself as an FBI

1 agent, falsely represented himself as an FBI agent.
2 (BY MR. SCAROLA:

3 Q. Do you have any personal knowledge of anything
4 that Mr. Fisten did while Mr. Fisten was in California?

5 MR. PIKE: To the extent that you can answer
6 that question without disclosing my conversation or
7 my firm's conversation or any of your attorneys'
8 conversations with you, you can answer the
9 question.

10 (THE WITNESS: I'm sorry. Based on
11 attorney/client privilege, I can't answer.)

12 BY MR. SCAROLA:

13 Q. (Is it your contention that Mr. Edwards was
14 involved in an illegal wire tap?)

15 (A. It was widely reported in the newspaper --)

16 (Q. I'm not asking it was reported --)

17 (A. Excuse me.)

18 (Q. -- in the newspaper.)

19 (A. Excuse me.)

20 (Q. I want to know whether your contention is that
21 Mr. Edwards was involved in an illegal wire tap.)

22 MR. PIKE: Try once again to answer that
23 question.

24 (THE WITNESS: It's been widely reported in the
25 newspaper that his firm and his partners were

1 (involved in illegal wire taps, eavesdropping, hired
 2 former FBI and law enforcement officials in order
 3 to fabricate cases of a sexually charged nature
 4 against me and others.

5 (BY MR. SCAROLA:

6 (Q. Do you have any personal knowledge of
 7 Mr. Edwards ever having engaged in any illegal wire tap?

8 (A. I have no personal knowledge; however, what I
 9 read in the newspapers and is widely reported is that
 10 his firm, and I believe Mr. Sakowitz went to the FBI
 11 after he was told that the firm was engaged in illegal
 12 wire taps and his partners were engaged in illegal wire
 13 taps.

14 (The FBI, the U.S. Attorney has accused his
 15 firm of RICO, being the largest criminal fraud
 16 enterprise in South Florida's history and engaged in
 17 illegal wire taps. But the answer specifically to your
 18 question about personal knowledge, sir, no.

19 (Q. Do you have any personal knowledge of
 20 Mr. Edwards ever having been involved in any illegal or
 21 improper eavesdropping?

22 A. (It's been widely reported in the newspapers in
 23 South Florida that Mr. Edwards' firm, his partners were
 24 involved in illegal wire taps, illegal fact gathering,
 25 using what the newspapers quoted as sophisticated

1 methods. Mr. Sakowitz, who was approached as an
 2 investor, and Mr. Scherer, who's filed a Complaint,
 3 alleges similar activities. But personal knowledge
 4 myself, sir, no.

5 (Q. Do you have any personal knowledge that
 6 Bradley Edwards was ever involved in obstructions of
 7 justice?

8 MR. PIKE: To the extent that you can answer
 9 that question without disclosing any
 10 attorney/client communications with any of your
 11 attorneys, you can answer that question.

12 (THE WITNESS: It's attorney/client privilege,
 13 I'm afraid.)

14 (BY MR. SCAROLA:

15 (Q. Do you have any personal knowledge that
 16 Bradley Edwards was ever involved in any actionable
 17 frauds?

18 MR. PIKE: Same -- same instruction, with any
 19 of your lawyers.

20 THE WITNESS: Yes. (Outside of the newspapers,
 21 which have accused his firm of a monstrous fraud,
 22 purported to be the largest fraud in South
 23 Florida's history, accused by the U.S. Attorney
 24 where his partner sits in jail -- excuse me --
 25 reported in the newspapers of boxes of material on

1 (Jeffrey Epstein, separate and apart from the
 2 allegations of fraud by his partners, I cannot
 3 answer that question because of attorney/client
 4 privilege.

5 BY MR. SCAROLA:

6 Q. Do you have any personal knowledge that
 7 Bradley Edwards was involved in any egregious civil
 8 litigation abuses?

9 MR. PIKE: Form. Confusing.

10 THE WITNESS: It's widely reported in the
 11 newspaper that Mr. Edwards' firm engaged in wild
 12 discovery processes, illegal activities, illegal
 13 eavesdropping in order to fleece unsuspecting
 14 investors in South Florida out of millions in
 15 dollars by crafting, fabricating malicious cases of
 16 a sexually charged nature in order to perpetrate a
 17 fraud.

18 BY MR. SCAROLA:

19 Q. (Do you have any personal knowledge that
 20 Bradley Edwards ever forged Federal Court Orders and/or
 21 Opinions?

22 (A. It's attorney/client privilege.

23 Q. Do you have any personal knowledge that
 24 Bradley Edwards was ever involved in the marketing of
 25 non-existing Epstein settlements?

1 MR. PIKE: Same instruction.

2 (THE WITNESS: I'm sorry. I would like to
 3 answer that question, but on attorney/client
 4 privilege I cannot today.

5 BY MR. SCAROLA:

6 Q. (It is alleged in your Complaint that you were
 7 subject to, quote, abusive investigatory tactics,

8 Other than those matters previously referred
 9 to in earlier questions, is it your contention that
 10 Bradley Edwards had any personal involvement in any
 11 other, quote, abusive investigatory tactics?

12 MR. PIKE: Form.

13 (THE WITNESS: It's been widely reported in the
 14 newspapers that Mr. Edwards' firm was engaged in
 15 widely -- wildly abusive practices throughout the
 16 State of Florida in order to fleece unsuspecting
 17 investors out of millions of dollars.)

18 (The U.S. Attorney's Complaint alleges his firm
 19 engaged in a corrupt criminal enterprise.)

20 (Mr. Scherer's Complaint alleges monstrous
 21 amounts of fraud and discovery abuse.)

22 (I have no personal knowledge, separate from
 23 the attorney/client privileged information,
 24 regarding Mr. Edwards.)

25 BY MR. SCAROLA:

1 (Q. Do you have any personal knowledge that
 2 Bradley Edwards ever filed legal papers that were
 3 unsupportable?

4 MR. PIKE: I'm going to object to form.

5 And to the extent you can answer that question
 6 without disclosing any attorney/client
 7 communications with any of your attorneys, I'm
 8 going to allow you to answer that question.

9 THE WITNESS: I'm afraid it's attorney/client
 10 privilege.

11 BY MR. SCAROLA:

12 Q. Do you have any personal knowledge that
 13 Mr. Edwards was ever involved in any conduct that,
 14 quote, compromised the core values of both State and
 15 Federal justice systems in South Florida?

16 MR. PIKE: Form.

17 (THE WITNESS: Can you just ask -- can you
 18 define for me what you mean by "personal
 19 knowledge," sir?

20 (BY MR. SCAROLA:

21 (Q. Yes. Did you ever see, hear, smell, taste, or
 22 touch anything that communicated to you directly and not
 23 through the report of some third person or newspaper
 24 that Bradley Edwards was personally involved in
 25 compromising the core values of both State and Federal

1 justice systems in South Florida?

2 (MR. PIKE: Form.)

3 (Same instruction with regard to
 4 attorney/client.)

5 (THE WITNESS: Yes. Are you suggesting that
 6 anyone who told me specifically or things that I
 7 might have read that specifically relate to him, is
 8 not what you've been asking me for?

9 (BY MR. SCAROLA:

10 (Q. Yes, sir, that's exactly right.

11 (A. You told me if I hear something, that's not
 12 personal knowledge.

13 (Q. Not if you hear it from somebody else.

14 (A. Who else would I hear it from, besides
 15 somebody else, sir?

16 (Q. Well, if you heard it directly yourself.

17 (A. From who?

18 (Q. Maybe Mr. Edwards.

19 (A. Uh-huh. Is that the only person, sir?

20 (Q. That's the only person, that's correct.

21 (A. Well, if it's the only person, separate from
 22 attorney/client privilege, I cannot answer that.

23 Q. Your Complaint makes reference to a purpose in
 24 filing this lawsuit to, quote, "vindicate the
 25 hardworking and honest lawyers and their clients who

1 were adversely affected by the misconduct that is the
 2 subject of this Complaint," unquote.

3 Who are those hardworking and honest lawyers
 4 that you are seeking to vindicate?

5 MR. PIKE: Form.

6 Give me a minute. What page of the Complaint
 7 are you referring to?

8 MR. SCAROLA: Page 2.

9 MR. PIKE: Give me one second.

10 THE WITNESS: Can we go off the record just
 11 for a second?

12 MR. PIKE: If it's okay with Mr. --

13 THE WITNESS: It's a bathroom break.

14 MR. PIKE: There's a question pending and
 15 usually --

16 THE WITNESS: Sorry.

17 MR. PIKE: Just give me a second.

18 Okay.

19 THE WITNESS: Where is it?

20 MR. PIKE: It's page 2 of the Complaint, which
 21 has my notes on it down here, the last sentence.

22 And to the extent that you have knowledge and
 23 can answer that question, you can do so.

24 THE WITNESS: Could you repeat the question
 25 for me, sir?

1 BY MR. SCAROLA:

2 Q. Yes, sir. Your Complaint makes reference to a
 3 purpose in filing this lawsuit --

4 (A. Yes.)

5 (Q. -- to vindicate the hardworking and honest
 6 lawyers and their clients who were adversely affected by
 7 the misconduct that is the subject of this Complaint.)

8 (A. Yes, sir.)

9 (Q. Who are those hardworking and honest lawyers
 10 on whose behalf you are bringing this Complaint?

11 MR. PIKE: Okay. Form. Mischaracterizes the
 12 Complaint itself.

13 To the extent you understand that question,
 14 you can attempt to answer, if you recall.

15 (THE WITNESS: Yes.)

16 (The U.S. Attorney, sir, has accused the
 17 Rothstein firm of misusing the entire legal system,
 18 a level of abuse never seen before in the United
 19 States history, of forging documents, an affront to
 20 any decent lawyer, signing Judge's Orders, sending
 21 false statements to other lawyers. The people who
 22 have been -- excuse me -- the Complaint by the U.S.
 23 Attorney, in fact, describes the behavior of the
 24 law firm, as well as Mr. -- my Complaint says,
 25 Mr. Edwards being a part of that.)

1 BY MR. SCAROLA:

2 Q. Now, before you answered that question, you
3 reviewed a document, right?

4 A. The Complaint, sir.

5 Q. I'd like to see it, please.

6 MR. PIKE: Definitely not, Mr. Scarola.

7 My notes are on that and that's
8 attorney/client. I allowed the witness to take a
9 look at the document and he did not write anything
10 on the document. He looked at the document.
11 That's my client. And you will certainly not be
12 looking at my notes, which are all over this
13 document.

14 MR. SCAROLA: He didn't look at everything.
15 He looked at one page. I would like that one page,
16 please.

17 MR. PIKE: Absolutely not, Mr. Scarola.

18 MR. SCAROLA: I would like that page marked as
19 an Exhibit to this deposition.

20 MR. PIKE: Absolutely not, Mr. Scarola.

21 MR. SCAROLA: I would state for the record
22 that it is my intention, since that page with
23 handwritten notations on it was reviewed by the
24 witness during the course of this deposition while
25 a question was pending, I want that page preserved

1 We have asked for Scott Rothstein's
2 deposition. We hopefully will get it. Maybe he will
3 give us some insight on how other lawyers have, in fact,
4 been handled and the abuses they've undergone, including
5 forging a Federal Judge's signature, sir.

6 Q. Now, was it your intention in this sentence to
7 say that you were trying to vindicate the hardworking
8 and honest lawyers and their clients?

9 A. It's attorney/client. I'm sorry.

10 Q. Your intention is attorney/client privileged?

11 MR. PIKE: Form. I'm not quite --

12 BY MR. SCAROLA:

13 Q. Is that what you're telling us?

14 MR. PIKE: Wait a second. I'm not quite sure
15 I understand the question.

16 THE WITNESS: What's the question?

17 BY MR. SCAROLA:

18 Q. Were you attempting to communicate in this
19 Complaint a desire on your part to vindicate hardworking
20 and honest lawyers and their clients?

21 MR. PIKE: Form.

22 THE WITNESS: In this Complaint, I intend to
23 get to the truth of Mr. Edwards' behavior and the
24 Rothstein firm, sir.

25 BY MR. SCAROLA:

1 so that the Court can make a determination as to
2 whether I am entitled to see it.

3 MR. PIKE: I would object based upon
4 attorney/client and work product in that regard.

5 THE WITNESS: Now can we take a bathroom
6 break?

7 MR. SCAROLA: No, sir, because you still
8 haven't answered my question.

9 THE WITNESS: Okay.

10 BY MR. SCAROLA:

11 Q. (I want to know who the, quote, "hardworking
12 and honest lawyers" are that are referred to in that
13 section of your Complaint.

14 A. (My attorneys, at least, are honest.

15 Q. (Which ones?

16 A. All of them.

17 Q. (And you say that you want to vindicate the
18 hardworking and honest lawyers and their clients?

19 A. That's correct.

20 Q. (Which clients?

21 A. (Me, some of the other clients, in fact, abused
22 by the Rothstein firm. I don't know the full extent,
23 Hopefully when we get to trial, we're going to find out
24 the extent of the people, the lawyers, the clients that
25 were abused by Mr. Edwards and the Rothstein firm.

1 Q. Well, what this sentence says is, quote, --

2 A. Yes.

3 Q. -- "the Rothstein racketeering enterprise
4 endeavored to compromise the core values of both State
5 and Federal systems in South Florida and to vindicate
6 the hardworking and honest lawyers and their clients who
7 were adversely affected by the misconduct that is the
8 subject of this Complaint."

9 Is that what you meant to communicate?

10 A. It says what it says, sir.

11 Q. Well, I know it says what it says. I'm trying
12 to find out if that's what you meant to say; that is,
13 that the Rothstein racketeering enterprise endeavored to
14 vindicate the hardworking and honest lawyers and their
15 clients who were adversely affected by the misconduct
16 that is the subject of this Complaint.

17 MR. PIKE: Form. Mischaracterizes the
18 language of the document.

19 THE WITNESS: Yeah, I think you've misread
20 that again. You want to -- I certainly didn't ask
21 for the Rothstein firm to vindicate the lawyers, is
22 what you've just --

23 BY MR. SCAROLA:

24 Q. Well, that's what I'm trying to find out,
25 whether you meant to say what you said in this

1 Complaint.

2 Did you read the Complaint before it was
3 filed?

4 MR. PIKE: Form. Move to strike.

5 THE WITNESS: Thank you, sir.

6 BY MR. SCAROLA:

7 Q. Did you read the Complaint before it was
8 filed?

9 A. It was a while ago, yes, sir.

10 Q. And did you approve the Complaint prior to its
11 filing?

12 A. Yes, sir.

13 Q. (And did you mean to say what this sentence
14 says, "the Rothstein racketeering enterprise endeavored
15 to vindicate the hardworking and honest lawyers and
16 their clients, who were adversely affected by the
17 misconduct that is the subject of this Complaint?"

18 (MR. PIKE: Okay. I'm going to move to strike.
19 Mischaracterizes the language of the document.

20 (The document reads as follows, for purposes of
21 the record: "The Rothstein racketeering enterprise
22 endeavored to compromise the core values of both
23 State and Federal justice systems in South Florida
24 and to vindicate the hardworking and honest lawyers
25 and their clients who were adversely affected by

1 (the misconduct that is the subject of this
2 Complaint.)

3 BY MR. SCAROLA:

4 Q. (Is that what you meant to say?

5 (A. What I meant to say, it is -- seems to me
6 somewhat unclear -- is that the Rothstein firm, along
7 with Mr. Edwards, is part of a criminal enterprise, the
8 largest -- excuse me -- the largest criminal enterprise
9 in South Florida's history, forging Judges' signatures,
10 engaging in illegal wire taps, illegal behaviors. And
11 part of this lawsuit should vindicate, which means, I
12 believe should set right.

13 (And if it's not clear, the Rothstein firm
14 compromised the core values of our legal justice system.
15 It abused every -- many of the precepts, the most basic
16 values of the American justice system.

17 (And, in fact, I believe this lawsuit, part of
18 the reason for filing this lawsuit, it will disclose the
19 various techniques of attorney/client privilege, abuse
20 of technique, abuse of discovery, illegal wire taps,
21 forging signatures engaged in by both Mr. Edwards and
22 his firm.)

23 Q. (So it is your contention that Mr. Edwards was
24 part of a criminal enterprise?)

25 A. (Yes, it is.)

1 Q. (Knowingly part of a criminal enterprise?)

2 MR. PIKE: Form.

3 (THE WITNESS: Attorney/client privilege.

4 MR. SCAROLA: You wanted to take a break and
5 before I move on to another subject, we'll do that.
6 But I want -- I want to observe for the record that
7 the last break was less than an hour ago. While I
8 want to try to make reasonable accommodations to
9 witnesses so as not to impose unnecessarily upon
10 their physical comfort, I will object to breaks
11 occurring at less than one-hour intervals during
12 the course of this deposition.

13 VIDEOGRAPHER: We're now off video record. It
14 is 11:34 a.m.

15 (Brief recess.)

16 VIDEOGRAPHER: We are now back on video
17 record. It is 11:45 a.m. and we are on media
18 number two.

19 BY MR. SCAROLA:

20 (Q. What knowledge do you have of Brad Edwards
21 ever having personally engaged in mail fraud?

22 (A. It's been widely reported in the press --

23 (Q. I'm going to withdraw my question.

24 (What personal knowledge do you have of Bradley
25 Edwards ever having been engaged in any mail fraud?

1 A. (Will you describe what you mean by "personal
2 knowledge," sir?

3 (Q. I mean direct observation through your senses
4 on your part.

5 (A. So are you asking me whether or not I've
6 witnessed him sending something directly, putting
7 physically in the mail, sir?

8 (Q. I'm asking whether you have ever personally
9 witnessed Bradley Edwards ever having engaged in mail
10 fraud.)

11 (A. I'm not sure how that's possible for anybody
12 to witness a mail fraud, so would you inform me how it's
13 done?

14 (Q. So the answer to my question is, you don't
15 know; is that correct?

16 (A. My answer to your question is --

17 (MR. PIKE: Form. Mischaracterizes the
18 witness' testimony.

19 (THE WITNESS: I've asked for a clarification.

20 (BY MR. SCAROLA:

21 (Q. Have you ever personally witnessed Bradley
22 Edwards engaging in mail fraud?)

23 MR. PIKE: Form.

24 (THE WITNESS: No, sir.)

25 BY MR. SCAROLA:

1 Q. (Have you ever personally witnessed Bradley
2 Edward -- Edwards engaged in wire fraud?

3 (A. How would one -- I'm not sure how anyone would
4 personal -- have personal knowledge, witness someone
5 engaging in wire fraud, unless they were simply sitting
6 over their computer looking at their bank accounts. So,
7 unfortunately, I would have to say, no, sir.

8 (Q. (Have you ever personally witnessed Bradley
9 Edwards engaged in money laundering?

10 MR. PIKE: Form.

11 (THE WITNESS: Again, sir, the U.S. Attorney's
12 Complaint of the Rothstein firm alleges money
13 laundering, wire fraud, mail fraud, RICO claims of
14 Mr. Edwards' partners and his firm, calling the
15 firm the largest criminal enterprise in South
16 Florida's history, accused of fabricating malicious
17 cases, sir, of a sexually charged nature in order
18 to fleece unsuspecting South Floridians out of
19 millions of dollars.

20 (BY MR. SCAROLA:

21 (Q. And I'm trying to find out, Mr. Epstein,
22 whether you have any evidence whatsoever that
23 Mr. Edwards ever personally participated in any of that
24 wrongdoing?

25 MR. PIKE: To that question, to the extent you

1 payout settlement?

2 MR. PIKE: Form.

3 (THE WITNESS: I'd like to answer that question
4 by saying that the newspapers have reported that
5 his firm was engaged in fraudulent structured
6 settlements in order to fleece unsuspecting Florida
7 investors.

8 (With respect to my personal knowledge, I'm
9 unfortunately going to, today, but I look forward
10 to at some point being able to disclose it, today
11 I'm going to have to assert the attorney/client
12 privilege.

13 (BY MR. SCAROLA:

14 (Q. Your Complaint alleges that Rothstein and
15 others in RRA were using RRA to market investments.

16 (Who are the others referred to in the
17 Complaint?

18 (A. (From my understanding of the U.S. Attorney's
19 Complaint, from Mr. Scherer's Complaint, it is the
20 partners and people who held themselves out to be
21 partners of the Roth -- Scott Rothstein, including
22 Mr. Berger, Mr. Adler, Mr. Edwards and other people
23 associated with the firm like Mr. Fisten, Diane
24 Villegas, if that's how you pronounce her name, Russell
25 Adler, and many of the other partners of his firm

1 can answer it without violating attorney/client and
2 work product, you can answer the question.

3 (THE WITNESS: I'm afraid it will be
4 attorney/client privilege, sir.

5 (BY MR. SCAROLA:

6 (Q. Do you have any evidence -- knowledge of any
7 evidence whatsoever that Mr. Edwards ever participated
8 in any effort to market any kind of investment in
9 anything?

10 (A. I would have to claim attorney/client
11 privilege on that, sir.

12 MR. PIKE: Form.

13 BY MR. SCAROLA:

14 (Q. (Do you have knowledge of any evidence
15 whatsoever that Mr. Edwards was ever a participant in
16 devising a plan through which were sold purported
17 confidential assignments of a structured payout
18 settlement?

19 A. (The newspapers and blogs have widely reported
20 that Mr. Edwards' firm crafted -- would you repeat the
21 question for me, again, sir? I'm sorry.

22 Q. (Yes, sir. I want to know whether you have any
23 knowledge of evidence that Bradley Edwards personally
24 ever participated in devising a plan through which were
25 sold purported confidential assignments of a structured

1 currently under investigation by either the Florida Bar
2 or the U.S. Attorney or FBI or all of the above, sir.

3 (Q. (Which -- which source of information
4 referenced in that answer specifically made reference to
5 Mr. Edwards?

6 (A. (I don't recall, sir.

7 Q. But you do have a recollection that one or
8 more of them did; is that correct?

9 A. I don't recall, sir.

10 Q. So you want to withdraw the earlier response
11 that you made and your real answer is, I don't know; is
12 that correct?

13 MR. PIKE: Mischaracterizes the witness'
14 testimony. Move to strike.

15 BY MR. SCAROLA:

16 Q. Your response, sir?

17 A. My answer stays the same, sir.

18 Q. Is it your contention that one or more
19 lawsuits was fabricated against you?

20 A. It's been widely reported in the newspapers --

21 Q. That's not my question.

22 A. Excuse me. I was answering.

23 MR. PIKE: Please let the witness answer the
24 question, Mr. Scarola.

25 BY MR. SCAROLA:

1 Q. No, you're not answering my question.

2 MR. PIKE: He's only said three words, so you
3 don't know whether he's answering your question or
4 not.

5 MR. SCAROLA: I didn't ask him anything about
6 newspapers. I asked him about his contention. I
7 don't know he's not answering my question.

8 BY MR. SCAROLA:

9 Q. But you can go ahead, Mr. Epstein, and you can
10 make your silly speech one more time.

11 MR. PIKE: I'm going to move to strike.

12 THE WITNESS: You want to repeat the question?

13 BY MR. SCAROLA:

14 Q. Yes, sir. I would like to know whether it is
15 your contention that one or more lawsuits have been
16 fabricated against you.

17 A. My contention, sir, is that the firm of
18 Edwards' partners, Scott Rothstein, fabricated many
19 cases, reported by the press and the U.S. Attorney,
20 amongst people like me and others of a sexually charged
21 nature in order to fleece investors of South Florida out
22 of millions of dollars.

23 Do I have a -- with respect to my individual
24 cases that Mr. Edwards has filed in these three cases,
25 I'm unfortunately today, and only today at least, on

1 advice of Counsel I'm going to have to assert my Fifth,
2 Sixth and 14th Amendment, sir.

3 Q. Okay. Well, I'm not limiting my question to
4 the three cases referenced in your Complaint. I want to
5 know whether you contend that any claim against you has
6 been fabricated?

7 MR. PIKE: Form. Overbroad and confusing and
8 it's compound.

9 THE WITNESS: The question makes no sense to
10 me. I'm sure you could do better.

11 BY MR. SCAROLA:

12 Q. Is there any pending claim against you which
13 you contend is fabricated?

14 A. At least today, sir, I'm going to have to
15 respond by asserting my Fifth, Sixth and 14th Amendment
16 Right.

17 MR. PIKE: Form, also.

18 BY MR. SCAROLA:

19 Q. Is it your contention that Bradley Edwards was
20 ever personally involved in manufacturing false and/or
21 fraudulent Court Opinions or Orders?

22 A. Attorney/client privilege.

23 Q. Your Complaint makes reference to someone
24 sifting through a potential defendant's garbage looking
25 for damaging evidence to use with investors to show how

1 potential defendants could be, in essence, blackmailed.

2 MR. PIKE: Would you identify for me,
3 Mr. Scarola, what page?

4 MR. SCAROLA: Page 8, paragraph 19.

5 BY MR. SCAROLA:

6 Q. Did anyone ever sift through your garbage
7 looking for damaging evidence?

8 MR. PIKE: One second.

9 In light of clarity, Mr. Scarola, would you
10 please read the entire paragraph so Mr. Epstein
11 understands the tenor of the paragraph?

12 MR. SCAROLA: No. I want to know whether
13 anyone ever sifted through Mr. Edwards' garbage --
14 through Mr. Epstein's garbage. That's the pending
15 question.

16 MR. PIKE: To the extent you understand the
17 question, you can answer.

18 THE WITNESS: I think the question is poorly
19 phrased. Did anyone ever sift through my garbage?
20 What does that mean?

21 BY MR. SCAROLA:

22 Q. You don't know what sifting through garbage
23 means?

24 A. Does that mean the garbage man? Does that
25 include the garbage man? I'm sure he sifted through my

1 garbage.

2 Q. Which garbage man sifted through your garbage?

3 A. I'm sure people who go through garbage sift
4 through the garbage. I have no idea.

5 Q. Did anyone ever sift through your garbage
6 (looking for damaging evidence)?

7 (A. It's been widely reported in the newspapers,
8 sir, that the Rothstein firm engaged in sifting through
9 many people's garbage in order -- in an attempt to
10 blackmail them.)

11 Q. Yes. But I didn't ask you what some newspaper
12 is alleged to have reported.

13 What I did ask you is whether anyone ever
14 sifted through your garbage looking for damaging
15 evidence.

16 And the answer to that question, I think, can
17 be either yes, no, or I don't know.

18 MR. PIKE: Move to strike.

19 BY MR. SCAROLA:

20 Q. Or you could refuse to answer it on the
21 grounds that it may tend to incriminate you.

22 A. I think you might --

23 MR. PIKE: Move to strike.

24 THE WITNESS: I would like to answer my own
25 questions. If you'd like to answer all my

1 questions, Mr. Scarola, I'm more than happy to sit
2 here and answer them. Would you like to continue?

3 BY MR. SCAROLA:

4 Q. (Yes. I'd like to know what the answer to that
5 question is. Did anyone ever sift through your garbage
6 (looking for damaging evidence?)

7 MR. PIKE: Form.

8 (THE WITNESS: I don't know.)

9 BY MR. SCAROLA:

10 Q. Did you ever have damaging evidence in your
11 garbage?

12 A. What's damaging evidence, sir?

13 Q. Evidence tending to implicate you in criminal
14 conduct.

15 MR. PIKE: Form.

16 THE WITNESS: At least today, Mr. Scarola,
17 with these -- with your questions and your claims
18 and your defense of Mr. Edwards and his firm, the
19 Rothstein firm, while his partner sits in jail,
20 today I'm going to have to assert my Fifth, Sixth
21 and 14th Amendment Right, sir.

22 BY MR. SCAROLA:

23 Q. Did you ever have any evidence in your garbage
24 that would subject you to blackmail?

25 MR. PIKE: Form. Same -- same objection.

1 THE WITNESS: Again, I'll respectfully answer
2 the question by asserting my Fifth, Sixth and 14th
3 Amendment Right.

4 BY MR. SCAROLA:

5 Q. Your Complaint in paragraph 21, page 9, says
6 that: "Upon information and belief, Rothstein, David
7 Boden, Debbie Villegas, Andrew Barnett, Michael Fisten
8 and Kenneth Jenne, all employees of RRA, through brokers
9 or middle men would stage regular meetings during which
10 false statements were made about the number of
11 cases/clients that existed or RRA had against Epstein
12 and the value thereof."

13 Do you have any knowledge that Mr. Edwards
14 ever knew about such meetings being conducted?

15 MR. PIKE: Form.

16 To the extent you understand the question and
17 it will not violate any attorney/client or work
18 product privilege information, you can answer that
19 question.

20 MR. SCAROLA: Mr. Pike, it has become evident
21 that that speaking instruction to your witness is
22 an instruction for him to assert an attorney/client
23 privilege, regardless of whether it is or is not
24 valid and I object to it.

25 MR. PIKE: Let me make the record clear.

1 You've been interchanging knowledge with personal
2 knowledge. And many of the objections to which I
3 am asserting an attorney/client and work product
4 privilege are based upon your malphrased question
5 and use of personal knowledge and knowledge
6 interchangeably with those questions.

7 So if you want to rephrase your question to
8 attempt to elicit a response -- let me finish --
9 then I have no objection to that. However, I'm not
10 going to sit here and allow my client to waive
11 attorney/client and work product.

12 Now, to the extent you're saying I'm coaching
13 the witness, I object to that because I am
14 certainly not. The witness is here to answer your
15 questions and I believe has been answering your
16 questions today to the best of his ability.

17 MR. SCAROLA: I am saying you're coaching the
18 witness.

19 BY MR. SCAROLA:

20 Q. Could you answer the question?

21 MR. PIKE: Same objection.

22 THE WITNESS: You'll have to repeat it.

23 BY MR. SCAROLA:

24 Q. (Do you have any information indicating that
25 Bradley Edwards ever had any knowledge of anyone

1 associated with the Rothstein firm holding meetings
2 during which, quote, "false statements were made about
3 the number of cases/clients that existed or RRA had
4 against Epstein and the value thereof," unquote?

5 MR. PIKE: Form. Same objection.

6 (THE WITNESS: My best recollection is the U.S.
7 Attorney has accused the Rothstein firm of just
8 those types of meetings where the partners got
9 together, schemed to defraud local investors of
10 millions of dollars by fabricating cases of a
11 sexually charged nature. And whether Mr. Edwards
12 personally participated, I'm going to at least
13 today, sir, have to assert the attorney/client
14 privilege, but look forward to one day disclosing
15 it.)

16 MR. SCAROLA: Move to strike all unresponsive
17 portions of the answer.

18 BY MR. SCAROLA:

19 Q. (Paragraph 23 of your Complaint says that:
20 "RRA, Rothstein and Edwards, claiming the need for
21 anonymity with regard to existing or fabricated clients,
22 they were able to effectively use initials," et cetera.
23 (Do you have any knowledge that Bradley Edwards
24 fabricated a client to bring a claim against you?)

25 MR. PIKE: Form.

1 (THE WITNESS: I believe Mr. Scherer's
2 Complaint--

3 (BY MR. SCAROLA:

4 Q. I'm not asking about Mr. Scherer's Complaint.
5 I'm asking about any evidence that you have.

6 MR. PIKE: The witness is basically been five
7 words into his sentence and you're not allowing him
8 to finish, once again.

9 So if you recall the question, then please
10 respond.

11 THE WITNESS: Please repeat it back, please?

12 MR. PIKE: Madame Court Reporter, if you
13 would.

14 (Pending question was read.)

15 MR. PIKE: Form.

16 (THE WITNESS: The pleadings of Mr. Scherer and
17 his claim against the Rothstein firm for a massive
18 fraud, as well as Mr. Sakowitz's claims to -- at
19 least in the -- described in the public press,
20 because he went to the FBI, for fabricating cases
21 that included initials.

22 (With respect to anything specific with
23 Mr. Edwards, I'm going to have to claim the
24 attorney/client privilege today, sir.

25 BY MR. SCAROLA:

1 MR. PIKE: -- then, please, --

2 THE WITNESS: Yes.

3 MR. PIKE: -- answer Mr. Scarola's question.

4 THE WITNESS: Separate from --

5 MR. SCAROLA: Objection. Coaching the
6 witness.

7 (THE WITNESS: Separate from the communication
8 I've had with my attorneys, I can't answer that
9 question.

10 MR. PIKE: Mr. Scarola, I'm confused. I
11 started objecting to form in the beginning of this
12 deposition. You then instructed me, which is
13 against the rules, Mr. Pike, I don't know what's
14 wrong with the form. I object to you objecting to
15 form.

16 Then I assert the attorney/client, work
17 product, and now you're telling me I'm coaching the
18 witness.

19 So tell me, Mr. Scarola, what is the -- what
20 is the way that you would like me to object in this
21 deposition, and maybe I can conform that way for
22 you, which may or may not be consistent with the
23 Florida Rules of Civil Procedure.

24 MR. SCAROLA: Mr. Pike, --

25 MR. PIKE: Yes, sir.

1 Q. (Do you have any -- do you have knowledge of
2 the existence of any evidence that Bradley Edwards knew
3 that Rothstein was utilizing RRA as a front for a Ponzi
4 scheme?)

5 MR. PIKE: Form.

6 (THE WITNESS: That's attorney/client
7 privilege.)

8 (BY MR. SCAROLA:

9 Q. Do you have knowledge of any evidence that
10 would indicate Bradley Edwards should have known that
11 Rothstein was utilizing RRA as a front for a Ponzi
12 scheme?)

13 MR. PIKE: Form.

14 THE WITNESS: At least today --

15 MR. PIKE: Wait.

16 THE WITNESS: Sorry.

17 MR. PIKE: Form. Same objections. Same
18 attorney/client, work product as to the last
19 question. Same objections here, attorney/client
20 work product.

21 (THE WITNESS: And today I'm going to have to
22 assert the attorney/client privilege.

23 MR. PIKE: To the extent you can answer that
24 question --

25 THE WITNESS: I understand.

1 MR. SCAROLA: -- if you don't know the
2 difference between a form objection and a privilege
3 objection --

4 MR. PIKE: Right.

5 MR. SCAROLA: -- then this deposition is not
6 the proper context in which for you to learn the
7 difference between a form objection and a privilege
8 action.

9 MR. PIKE: I'm pretty clear on what a form
10 objection is and what a privilege objection is and
11 I'm pretty knowledgeable on that. The problem --

12 MR. SCAROLA: Then we don't need to engage in
13 any further discussion.

14 MR. PIKE: -- I want to try to make the record
15 clear, because initially you didn't want me to
16 object to form. You wanted me to speak. So I'm
17 thinking you're conceding to that point.

18 What my question is, is: What's wrong with my
19 objecting to attorney/client, work product? So I
20 guess I'm asking you what you were asking me
21 earlier on. What's wrong with the form?

22 We can just move forward.

23 BY MR. SCAROLA:

24 Q. In your Complaint you identify the RRA law
25 firm, Rothstein and Edwards, as the, quote, "litigation

team," unquote.

You then go on to say in paragraph 31 of your Complaint at page 12 that: "Rothstein and the litigation team" --

MR. PIKE: Wait a minute. Put that down for a second. Hold on.

THE WITNESS: You can read it.

BY MR. SCAROLA:

Q. "Individually and in a concerted effort may have unethically and illegally engaged in certain specified conduct."

May we correctly conclude from that statement that you don't have any knowledge as to whether the, quote, "litigation team," including Mr. Edwards, engaged in any unethical and illegal conduct?

MR. PIKE: For now, while I'm reviewing the document itself, I'm just going to just tell you to hold off --

THE WITNESS: Sure.

MR. PIKE: -- on answering that question.

You may want to go off the record, so we don't have a lag in --

MR. SCAROLA: No, I'd like it on the record. Thank you.

MR. PIKE: Mr. Scarola, did you bring an extra

Edwards, individually and personally, sold, allowed to be sold and/or assisted with the sale of an interest in non-settled personal injury lawsuits?

MR. PIKE: Before you answer that question, Madame Court Reporter, will you please read that question back to me?

(Pending question was read.)

MR. PIKE: To the extent you can answer that question without divulging attorney/client or work product information, you may answer that question.

MR. SCAROLA: Objection. Coaching.

THE WITNESS: You said, allowed to be sold. I'm going to assert attorney/client privilege to the answer, I'm afraid, but I'd like to answer that question.

BY MR. SCAROLA:

Q. (Do you have knowledge of any evidence indicating that Bradley Edwards ever reached agreements to share attorney's fees with non-lawyers?)

MR. PIKE: I'm sorry. Mr. Scarola, can you tell me what page of the Complaint you're referring to, if you are?

MR. SCAROLA: I'm not referring to any page of the Complaint, although I will tell you that that precise allegation is made in the Complaint.

copy of the Complaint that you're questioning Mr. Epstein on for Mr. Epstein to look at?

MR. SCAROLA: No.

MR. PIKE: Okay. I'm going to have to go get him a copy so he can -- the paragraphs of this Complaint are very long and the Complaint itself is in excess of -- it was approximately 35 pages, so...

MR. SCAROLA: I'll withdraw the question.

BY MR. SCAROLA:

Q. (Do you have any evidence that Brad Edwards sold, allowed to be sold and/or assisted with the sale of an interest in non-settled personal injury lawsuits?)

MR. PIKE: Form.

THE WITNESS: (The newspapers have widely reported that the Rothstein firm engaged in illegal structured settlements of cases of a sexual nature, including specifically, me. We have subpoenaed the documents from Mr. Edwards and his firm and we have not been able to get them as of yet.)

I am confident that once we do, I will be able to answer your questions with more specificity.

BY MR. SCAROLA:

Q. (As you sit here today, do you have any evidence whatsoever to support an assertion that Bradley,

THE WITNESS: (In fact, Mr. Scarola, we have subpoenaed Mr. Edwards' documents and documents from his firm that I believe will, in fact, give me more specificity with the answers to that question.)

(I'm looking forward to getting the -- that specific evidence. With respect to what we currently know, sitting here today, I'm unfortunately going to have to claim my attorney/client privilege.)

BY MR. SCAROLA:

Q. (Do you today have any evidence to support an assertion that Bradley Edwards ever used investor money to pay L.M., E.W., and/or Jane Doe up-front money, such that they would refuse to settle civil actions?)

MR. PIKE: Same instruction.

THE WITNESS: You'll have to get -- I need to hear the first part of the question. Do I have any evidence? Do I have knowledge of evidence? I'm sorry. What was the --

BY MR. SCAROLA:

Q. Do you have knowledge of any evidence to support that assertion?

MR. PIKE: To the extent you can answer that question without violating attorney/client, work product, please do so.

MR. SCAROLA: Objection. Coaching.

THE WITNESS: I'm going to have to assert the attorney/client privilege, I'm afraid, though I'd like to answer that question as well, sir.

BY MR. SCAROLA:

Q. (Do you have any evidence to support the assertion that Bradley Edwards conducted searches, wire taps or intercepted conversations in violation of State or Federal laws and Bar rules?)

A. (Your question, once again, asked did Mr. -- was Mr. Edwards personally involved in the eavesdropping? Did he walk to someone's house and sort of put a bug in their house? Did he, personally, stand outside?)

(The question is, did Mr. Edwards' firm engage in this behavior in an attempt to defraud local investors out of millions of dollars? The U.S. attorney has filed a Complaint saying that they did. The Complaints filed by Scherer saying that his firm did.

(The Scherer Complaint says my name and the boxes of files that we've subpoenaed used my name, sir.

(We have requested information, but up until

today have not received any,

(To give you a more specific answer, I'm afraid

(I cannot,

To the extent you can answer the question without disclosing attorney/client or work product information, do so.

(THE WITNESS: The pleadings of Mr. Scherer with respect to the largest Ponzi scheme in South Florida's history engaged in by Mr. Edwards' firm and Scott Rothstein, who currently sits in jail, probably for the rest of his life for engaging in, not only illegal wire taps and eavesdropping, but an abuse of the entire legal system, I believe speaks for itself.

(Unfortunately, with respect to Mr. Edwards today, I'm going to have to assert the attorney/client, work privilege, sir.

BY MR. SCAROLA:

Q. (Is it your contention that Mr. Scherer's Complaint even contains the name Bradley Edwards?)

A. (I don't recall, sir.

Q. Did sexual assaults ever take place on a private airplane on which you were a passenger?

MR. PIKE: Form. Relevance.

THE WITNESS: At least -- I would like to answer each and every one of your questions here today, Mr. Scarola. But at least today, I'm going to have to assert my Fifth, Sixth and 14th

Q. (Do you have knowledge of any evidence that Bradley Edwards ever conducted searches, wire taps or intercepted conversations in violation of State or Federal laws and Bar rules?)

MR. PIKE: Same instruction.

THE WITNESS: (The newspapers and the U.S. Attorney's Complaint widely reported that Mr. Edwards' firm and people hired by his firm, investigators hired by his firm fraudulently representing themselves as FBI agents engaged in just those activities, sir.

BY MR. SCAROLA:

Q. (Do you have any knowledge of any evidence that Bradley Edwards was ever aware of any such activities?)

A. (I'm going to have to --)

MR. PIKE: Same objection.

THE WITNESS: -- assert the attorney/client privilege to that, sir.

BY MR. SCAROLA:

Q. (Do you have any knowledge that Bradley Edwards ever participated in or was aware of actions that utilized the judicial process, including, but not limited to, unreasonable and unnecessary discovery for the sole purpose of furthering a Ponzi scheme?)

MR. PIKE: Same objection.

Amendment Rights as provided by the U.S. Constitution.

BY MR. SCAROLA:

Q. Does a flight log kept for a private jet used by you contain the names of celebrities, dignitaries or International figures?

A. At least today, sir, I'm going to have to respectfully decline to answer based on my Fifth, Sixth and 14th Amendment Right, though I'd like to answer that question.

Q. Have you ever had a personal relationship with Donald Trump?

A. What do you mean by "personal relationship," sir?

Q. Have you socialized with him?

A. Yes, sir.

Q. Yes?

A. Yes, sir.

Q. Have you ever socialized with Donald Trump in the presence of females under the age of 18?

A. Though I'd like to answer that question, at least today I'm going to have to assert my Fifth, Sixth and 14th Amendment Right, sir.

Q. Have you socialized with Alan Dershowitz?

A. Yes, sir. He's my attorney, as well as a

1 friend.

2 Q. (Have you ever socialized with Alan Dershowitz
3 in the presence of females under the age of 18?

4 (MR. PIKE: Form.

5 (THE WITNESS: Sir, at least here today, I'm
6 going to have to assert my Fifth Amendment, Sixth
7 Amendment and 14th Amendment Rights.

8 BY MR. SCAROLA:

9 Q. Have you ever socialized with Tommy Mottola?

10 A. This is the type of questions where people who
11 have nothing to do with this case whatsoever have been
12 brought into the case by Mr. Edwards in an attempt to
13 simply imperil my relationships with social friends and
14 serves as an example of why this case has been brought
15 against Mr. Edwards and his firm, sir.

16 MR. PIKE: Form as well.

17 BY MR. SCAROLA:

18 Q. Well, do you know who brought those persons'
19 names into this lawsuit?

20 (MR. PIKE: Form.

21 (And just to be clear, what Mr. Scarola, I
22 believe, talking about this lawsuit, Epstein versus
23 RRR?)

24 (BY MR. SCAROLA:

25 (Q. Yes, sir, that's the lawsuit I'm talking

1 (this -- just this type of behavior, the answer is,
2 today, at least, I must assert my Fifth, Sixth and
3 14th Amendment Right, though I'd like to answer
4 each and every one of your questions, Mr. Scarola.

5 BY MR. SCAROLA:

6 Q. Have you had a social relationship with David
7 Copperfield?

8 A. As a reaction to, once again, the abusive
9 discovery process of bringing in names of people that
10 have absolutely nothing to do with any of Mr. Edwards',
11 Mr. Rothstein's or their clients' claims, by bringing in
12 the names of friends of mine strictly in an attempt to
13 stress my relationships, imperil my business
14 relationships, I'm going to say, yes, I do know
15 Mr. Copperfield.

16 Q. (Have you ever socialized with David
17 Copperfield?

18 (A. Again, as --

19 (MR. PIKE: Form.

20 (THE WITNESS: Sorry,

21 (It's a typical Edwards/Rothstein strategy of
22 trying to involve well-known people in maliciously
23 fabricated cases in order to fleece investors out
24 of millions of dollars. They brought up names in
25 attempts at abuse of discovery process to try and

1 about. The one in which your deposition is being taken
2 today.

3 Do you know who brought those persons' names
4 into this lawsuit?

5 A. As a reaction, and only as a reaction to total
6 misbehavior on Mr. Edwards' part, and the Complaint was
7 obviously written by my attorneys, sir.

8 Q. So you know that those names are in your
9 Complaint, right?

10 A. Yes, sir.

11 Q. Okay. So because those names are in your
12 Complaint, I'm asking you about the people you named.

13 Have you had a social relationship with Tommy
14 Mottola?

15 A. The names in my Complaint are strictly as a
16 reaction to the abusive discovery process by
17 Mr. Edwards, his partners, Scott Rothstein, who sits in
18 jail, in an attempt to imperil my friendships.

19 But, yes, I have socialized with Mr. Mottola.

20 Q. Have you ever socialized with Mr. Mottola in
21 the presence of females under the age of 18?

22 MR. PIKE: Form.

23 THE WITNESS: At least today, the typical to
24 the Edwards contention of bringing cases of a
25 malicious nature where his partner sits in jail for

1 (take discovery of people who have nothing to do
2 with this case.

3 (Did I socialize with David Copperfield? The
4 answer is, yes.

5 (BY MR. SCAROLA:

6 (Q. Did you ever socialize with David Copperfield
7 in the presence of females under the age of 18?

8 (A. I'm sure, again, this question is a typical
9 question of Mr. Edwards/Rothstein scheme to defraud
10 investors, asking questions knowing it serves no purpose
11 or relationship relevance to their case whatsoever.

12 (At least today, though I'd like to answer that
13 question, on advice of my Counsel, and only on advice of
14 my Counsel, I'm going to have to assert my Fifth, Sixth
15 and 14th Amendment Right.

16 (MR. PIKE: Form as well.

17 BY MR. SCAROLA:

18 (Q. Have you ever had a social relationship with
19 Bill Richardson, Governor of New Mexico and formerly
20 U.S. Representative and Ambassador to the United
21 Nations?)

22 (MR. PIKE: Form.

23 (THE WITNESS: As is typical of the Edwards
24 scheme, along with his partner, Scott Rothstein,
25 who sits in jail, what they attempted to do was

(bring in any celebrity I might have known, well-known people, in an attempt to strictly imperil my relationships with these people where these people have no bearing whatsoever on any of their claims or cases.)

(Yes, I do have a social relationship.)

(BY MR. SCAROLA:

Q. (Have you ever socialized with Mr. Richardson in the presence of females under the age of 18?

(MR. PIKE: Form.

(THE WITNESS: Again, typical of the Edwards/Rothstein scheme of bringing in well-known people, asking them ridiculous questions, ridiculous questions in an attempt strictly to imperil my relationships with these people where they have absolutely nothing to do with anything to do with Edwards, Rothstein or any of their alleged victims, the answer to your question is, yes, I have socialized.)

(BY MR. SCAROLA:

Q. (Yes, but that wasn't my question.)

(My question was: Have you ever socialized with Mr. Richards in the presence of females under the age of 18?

(MR. PIKE: Form.)

THE WITNESS: In response to your question, again, my full answer was, typical of the Edwards/Rothstein scheme to ask questions of a sexual charged nature, crafted cases, the U.S. Attorney has called his firm the largest fraud in U.S. history, fleecing investors out of millions of dollars by engaging in just these types of questions. Though I would like to answer each and every question about every one of these people, on advice of my Counsel today, I must take -- assert my Fifth Amendment, Sixth Amendment and 14th Amendment Right. Though I'd prefer to answer the question, I was told that if I choose to do so, I risk losing their representation, sir.

BY MR. SCAROLA:

Q. Have you ever sexually abused children?

MR. PIKE: Form.

THE WITNESS: On advice of Counsel, and only upon advice of Counsel, though I'd like to answer that question, as well as every other one of your claims brought by Mr. Edwards and his partner, who currently sits in jail, sir, I would like to answer those questions. But today at least, I have to assert my Sixth Amendment, 14th Amendment and Fifth Amendment Right. Though I'd prefer to answer the

(question, I'm told by my Counsel that if I choose to do so, which is my preference, I risk losing their representation.)

(BY MR. SCAROLA:

Q. (How many children have you sexually abused?

(MR. PIKE: Form.

(And I just want to be clear on the record.

(These types of questions are argumentative and harassing. And, moreover, it's my contention that these types of questions are not related to this lawsuit by any stretch of the imagination. In this deposition, while I've been liberal in allowing these questions, are being utilized in an attempt to provoke a waiver of the Fifth Amendment Right.)

There has been an Order entered by, I believe, Judge Hafele regarding these types of questions.

So with that caution, Mr. Scarola, I would ask you that you refrain from asking abusive and harassing questions that are not relevant to this case.

MR. SCAROLA: Well, it's very interesting that you claim they're not relevant when they are directly taken from the allegations in your Complaint.

And I agree with you that they are not

relevant because there is no basis whatsoever for this claim against Mr. Edwards. But since you've made these baseless allegations, I am obliged to pursue the allegations by asking these questions.

So we'll move on from there. And whenever you think it's appropriate to terminate this deposition because you believe that I've acted inappropriately, be my guest.

MR. PIKE: I appreciate your invitation, Mr. Scarola.

I'm going to move to strike.

The fact is, Mr. Scarola, is that, these types of questions have already been ruled upon as being argumentative and harassing.

If you want to direct some questions relevant to your lawsuit, I invite you to do so. But attempting to use this deposition process as a mechanism to provoke a waiver of the Fifth Amendment and to obtain information that is more or potentially more relevant to Mr. Edwards' cases in which he is lead Counsel on, I think is improper.

BY MR. SCAROLA:

Q. Did you have staff members that assisted you in scheduling appointments with underage females; that is, females under the age of 18?

1 Q. What day are you prepared to answer all these
2 questions?

3 MR. PIKE: Form. Attorney/client and work
4 product.

5 THE WITNESS: That's attorney -- I wish I
6 could answer that question as well, but it's
7 attorney/client privilege, sir.

8 BY MR. SCAROLA:

9 Q. Your Complaint says that: "Rather than
10 evaluating and resolving the cases based on the merits,"
11 open parens, "i.e., facts," close parens, "which
12 included knowledgeable, voluntary and consensual actions
13 by each of the claimants," et cetera.

14 Who are the claimants that are referenced
15 there?

16 A. It's -- I'm sorry. You have to repeat the
17 question.

18 Q. Yes, sir. Your Complaint says: --

19 MR. PIKE: Page?

20 Q. -- "rather than evaluating" --

21 MR. PIKE: Can you give me a page, sir?

22 MR. SCAROLA: Page 27, paragraph 49, second
23 sentence.

24 BY MR. SCAROLA:

25 Q. Quote, "rather than evaluating and resolving

1 the cases based on the merits, that is, facts which
2 included knowledgeable, voluntary and consensual actions
3 by each of the claimants."

4 A. Yes.

5 Q. Who are the claimants that you're referencing
6 there?

7 A. They're the prostitutes you referred to in the
8 past, sir.

9 Q. What are their names?

10 A. I think the prostitutes' names were -- the
11 prostitute that you described before was L.M.

12 With respect to the others, I'm going to have
13 to claim the Fifth, Sixth and 14th Amendment, sir.

14 Q. So one of the individuals that you're
15 referencing there is L.M.; is that correct?

16 A. It's -- the individual I've referenced is a
17 person who filed a claim against me.

18 Q. Is it L.M.?

19 A. It is L.M., as far as I know from the claim,
20 sir.

21 Q. Okay. So one of the people that you're
22 referring to is L.M., who you've identified as L.M.; is
23 that correct?

24 A. With respect to that question, sir, on advice
25 of Counsel, I'm going to have to assert my Fifth, Sixth

1 and 14th Amendment.

2 Q. What are the voluntary and consensual actions
3 by L.M. that you are referencing there?

4 A. Sir, though I'd like to answer each one of
5 your questions here today, I'm going to have to
6 respectfully decline based on advice of my Counsel, and
7 have to assert my Fifth, Sixth and 14th Amendment Right.

8 Q. (What are the damages that you claim to have
9 suffered as a consequence of any wrongdoing on the part
10 of Bradley Edwards?)

11 MR. PIKE: Form.

12 (THE WITNESS: The cost of ridiculous
13 litigation, of having my attorneys prepare
14 responses to wildly irrelevant discovery in various
15 locations at a minimum, sir.)

16 BY MR. SCAROLA:

17 Q. (Which lawyers?)

18 A. (Burman Critton, Jack Goldberger, and a bunch
19 of the others, sir.)

20 Q. (Which ones? Name them for me, please.)

21 A. (Specifically -- I have so many lawyers
22 defending me here against Mr. Edwards, I can't sit
23 here -- at the moment I can't recall it with
24 specificity.)

25 Q. (You don't remember any of your lawyers' names?)

1 A. (Oh, I do.)

2 Q. (Besides Mr. -- besides the Burman Critton firm
3 and Mr. Goldberger?)

4 A. (Are you asking me for the firm, sir, or are
5 you asking me for the names?)

6 Q. (I want as much information as you can give me
7 about this element of damage which you claim; and, that
8 is, the cost of legal services that you claim to be
9 damages in this case.)

10 A. (Okay.)

11 MR. PIKE: Form. And move to strike.

12 (THE WITNESS: Mr. Roy Black.)

13 BY MR. SCAROLA:

14 Q. (Okay. Who else?)

15 A. (Mr. Marty Weinberger, Mr. Alan Dershowitz,
16 Mr. Jay Lefkowitz. The firm of Burman Critton Luttier.
17 (That's it for the moment.)

18 Q. (How much have you paid the law firm of Burman
19 Critton and Luttier which you claim is damages?)

20 A. (Hundreds of thousands of dollars, sir.)

21 Q. (How much?)

22 A. (I don't have that figure offhand.)

23 Q. (Can you give us any better figure than
24 hundreds of thousands of dollars?)

25 (A) (No, not sitting here today.)

1 Q. (Are you paying them on an hourly basis?)
 2 A. Yes, sir.
 3 Q. What is the hourly rate at which you are
 4 compensating members of the law firm?
 5 A. They're ordinary rates.
 6 Q. (What are they?)
 7 A. I don't know.
 8 Q. How much have you paid Mr. Goldberger?
 9 A. I'm not aware total amount, sir.
 10 Q. (What is the hourly rate at which you're paying
 11 Mr. Goldberger?)
 12 A. His normal hourly rate.
 13 Q. How much is that?
 14 A. I don't know.
 15 Q. How much have you paid Mr. Black which you
 16 claim as damages in this case?
 17 A. Hundreds of thousands of dollars.
 18 Q. Are you paying him on an hourly basis?
 19 A. I believe so.
 20 Q. (What is the hourly rate?)
 21 A. I'm not -- I do not know, sir.
 22 Q. How much have you paid Marty Weinberger?
 23 A. (I don't know the exact amount, sir.)
 24 Q. What's your best estimate?
 25 A. More than a hundred thousand dollars.

1 Q. (Are you paying him on an hourly basis?)
 2 A. I believe so.
 3 Q. What's the hourly rate?
 4 A. I don't know, sir.
 5 Q. How much have you paid Alan Dershowitz?
 6 A. Hundreds of thousands of dollars.
 7 Q. (Are you paying him on an hourly basis?)
 8 A. I believe so.
 9 Q. At what hourly rate?
 10 A. I don't know, sir.
 11 Q. How much are you paying Jay -- how much have
 12 you paid Jay Lefkowitz?
 13 A. I'm not sure, sir.
 14 Q. (Do you have any idea at all?)
 15 A. More than a hundred thousand dollars.
 16 Q. Are you paying him on an hourly basis?
 17 A. Yes, sir.
 18 Q. What's the hourly rate?
 19 A. I don't know.
 20 Q. (What is the form of payment to your lawyers?
 21 How do you transfer money to them?)
 22 A. I don't know, sir.
 23 MR. PIKE: Form.
 24 BY MR. SCAROLA:
 25 Q. (Pardon me?)

1 A. (I don't know.)
 2 Q. Does someone do that on your behalf?
 3 A. (I would guess so.)
 4 Q. Who?
 5 A. I don't know.
 6 MR. PIKE: Form.
 7 BY MR. SCAROLA:
 8 Q. Who are the people who are authorized to make
 9 payment on your behalf?
 10 A. With respect to that question, I'm going to
 11 have to assert the Fifth, Sixth and 14th Amendment, sir.
 12 Q. (Are there any other elements of damage, apart
 13 from the money paid to lawyers?)
 14 A. Yes, sir.
 15 Q. (What?)
 16 A. The stress and emotional damage of imperiling
 17 my friendships and business relationships with no
 18 relevance whatsoever to these cases, brought by a firm
 19 (that whose partner sits in a Federal prison, who engaged
 20 in discovery to harass my friends and social contacts
 21 with no consideration or relevance to this case
 22 whatsoever, in an attempt to simply fleece -- partly
 23 fleece investors in South Florida out of millions of
 24 dollars, sir.)
 25 Q. (What is the value of those losses?)

1 MR. PIKE: Form.
 2 THE WITNESS: (I'm not sure yet, sir.)
 3 BY MR. SCAROLA:
 4 Q. (Do you have any idea at all?)
 5 A. Not sitting here today.
 6 Q. (More or less than \$10?)
 7 MR. PIKE: Form.
 8 (THE WITNESS: I would guess it's more than
 9 \$10, sir.)
 10 BY MR. SCAROLA:
 11 Q. More or less than a hundred?
 12 A. (I would guess it's quite an amount of money.)
 13 Q. (Is it more or less than a hundred?)
 14 A. Yes, sir.
 15 Q. More or less than a thousand?
 16 A. I would say it's more than 150,000.
 17 Q. More or less than a million?
 18 A. I don't know, sir.
 19 Q. (So somewhere between 150,000 and a million?)
 20 A. No, sir. It's not --
 21 MR. PIKE: Form. Mischaracterizes the
 22 witness' testimony.
 23 (THE WITNESS: No, sir. That's not what I
 24 said. I said, I did not know.)
 25 BY MR. SCAROLA:

Q. Maybe more than a million?

A. Maybe.

Q. More or less than a billion?

MR. PIKE: Form.

(THE WITNESS: I don't know.)

BY MR. SCAROLA:

Q. Maybe more than a billion?

A. Maybe more.

Q. How are you going to go about finding out what the value of that loss is?

MR. PIKE: Attorney/client, work product.

To the extent you can answer without disclosing our conversations or the conversations with your other attorneys that you've delineated, you can do so.

BY MR. SCAROLA:

Q. Or you can just take the signal and say, I refuse to answer because it's attorney/client privilege.

A. I resent that.

MR. PIKE: Move to strike.

THE WITNESS: But it's okay. You can continue to try to harass me, sir. It doesn't work. The ladies and gentlemen of the jury, hopefully when they see the deposition will recognize and see these pile of tricks. The answer --

BY MR. SCAROLA:

Q. Do you attribute all of the damages that you have described to Mr. Edwards' conduct?

MR. PIKE: Form.

THE WITNESS: As a participant -- I don't know how to proportion the conduct as opposed to Mr. Edwards and his partner who sits in jail. I guess the U.S. Attorney will also make a decision to how much the conduct and proportion is relevant to both damages and anything else he's done in this case, sir.

BY MR. SCAROLA:

Q. But I'm not asking you about what the U.S. Attorney's opinion is.

I want to know whether you hold Mr. Edwards responsible for all of those elements of damage that you have described to us.

A. It's a difficult question to answer, Mr. Scarola.

Q. No, it's easy. Yes, no, or I don't know.

MR. PIKE: Mr. Scarola, you know as well as I do, the witness is attempting to answer your question.

MR. SCAROLA: I don't think so. I think he's attempting to evade all of my questions.

MR. SCAROLA: Hopefully they will.

THE WITNESS: Yes.

MR. PIKE: Move to strike.

(THE WITNESS: I will respectfully decline to answer that.)

BY MR. SCAROLA:

Q. On what basis?

A. Attorney/client privilege.

MR. PIKE: And work product.

BY MR. SCAROLA:

Q. Any other elements of damage?

A. Not -- there might be, but sitting here today, I can't think of them.

Q. Do you have written contracts with any of your lawyers?

A. I don't know.

Q. Who does?

A. I don't know.

MR. SCAROLA: Let's take a short break. We may be finished.

VIDEOGRAPHER: We are now off the record at

1:12 p.m.

(Brief recess.)

VIDEOGRAPHER: We are back on video record at

1:18 p.m.

MR. PIKE: And I understand your contention. However, if you would, allow Mr. Epstein to finish his response.

THE WITNESS: Could you repeat your question?

BY MR. SCAROLA:

Q. Do you hold Mr. Edwards responsible for all of the damages that you have described?

MR. PIKE: Form.

THE WITNESS: It's difficult for me to proportion the damages that I have described between Mr. Edwards, his partner, who is currently in jail, his -- the other people named in the Complaint. Hopefully a jury will do that.

BY MR. SCAROLA:

Q. Do you hold L.M. responsible for all of the damages you have described?

MR. PIKE: Form.

THE WITNESS: Again, these questions, these ambiguous questions, as opposed to who participated, I would let Mr. Edwards and his clients and his partners decide whose proportionate responsibility it is, sir.

BY MR. SCAROLA:

Q. So you defer to them?

MR. PIKE: Form.

APP. 33

NOT A CERTIFIED COPY

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,

Defendants,

_____/

COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
AMENDED EXHIBIT LIST

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his Amended Exhibit List as follows:

INDEX TO OBJECTIONS

- | | |
|--|---|
| O. No objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No. 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List

Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Search Warrant of Jeffrey Epstein's home being executed.			
17.	Application for Search Warrant of Jeffrey Epstein's home.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home.			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
32.	List of properties and vehicles in Larry Visoski's name.			
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.			
36.	All Complaints in which Jeffrey Epstein is/was a defendant.			
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.			
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.			
41.	Report and Analysis of Jeffrey Epstein's assets.			
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home..			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victim.			
47.	Expert Dr. L. Dennison Reed's Report of Victim.			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff			Marked	Marked for
No.	Description of Exhibit	Objection	in Evidence	Identification
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Massage Table.			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts.			
67.	Documents related to Jeffrey Epstein's investments.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	List of planes owned by Jeffrey Epstein.			
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06.			
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06.			
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06.			
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06.			
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06.			
75.	Letter from Goldberger dated 6-22-06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410.			
84.	Guy Fronstin letter dated 4-17-06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			
88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes.maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher dated 5-1-06.			
95.	Alexandra Hall Police Report dated 11-28-04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter dated 7-9-08.			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff				
No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
122.	All flight logs for any Epstein owned or controlled aircraft			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M. Case No. 502009CA040800XXXXMBAG Counter-Plaintiff's, Bradley J. Edwards, Amended Exhibit List				
Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
133.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
134.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
135.	Any and all documents produced in this action.			
136.	Any and all depositions taken in this action.			
137.	Any documents or other exhibit attached to or used during any deposition in this action.			
138.	Any and all exhibits, documents, etc. referred to in any deposition.			
139.	Any and all documents and exhibits designated by all parties to this action.			
140.	Any and all exhibits needed for impeachment or rebuttal.			
141.	Any and all pleadings filed in this action.			
142.	Any and all records produced or that will be produced by all records custodians relative to this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

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 9th day of November, 2017.



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Attorneys for Bradley J. Edwards

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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Amended Exhibit List

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Fax: (954)-745-3556
Attorneys for Scott Rothstein

APP. 34

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN AND
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'S OBJECTIONS TO DEFENDANT/
COUNTER-PLAINTIFF'S AMENDED EXHIBIT LIST**

Plaintiff/Counter-Defendant, Jeffrey Epstein, files the following Objections to
Defendant/Counter-Plaintiff, Bradley J. Edwards' Amended Exhibit List dated November 9, 2017:

LEGEND FOR OBJECTIONS:

- 1 – All Objections
- 2 – All Objections except Authenticity
- 3 - Relevance
- 4 – Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence
- 5 – Privileged
- 6 - Opinion
- 7 – Hearsay
- 8 – Authenticity
- 9 – Other (please identify basis of objection)
- 10 – Completeness
- 11 – Overbroad
- 12 – Not provided to Counsel for Epstein Prior to Filing Pretrial Stipulation
- 13 – Not a proper exhibit
- 14 – Trade secrets/Confidential

No.	Edwards' Exhibit Description	Epstein's Objections
1.	All applicable criminal statutes	3, 4, 7, 11, 12
2.	All applicable Florida Statutes	3, 4, 7, 11, 12
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12
4.	Order confirmation from <u>Amazon.com</u> for purchase of books "SM 101: A realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"	3, 4, 7, 8
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10
6.	Jane Doe 102 Complaint	3, 4, 7, 13
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11 14
12.	Jail Visitation Logs	3, 4, 7, 8, 11
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8
16.	Video of Search Warrant of Jeffrey Epstein's home being executed	3, 4, 8
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8, Cannot be read
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")
19.	All records of homes, properties, bank accounts and any/all records related to Jeffrey Epstein's assets	12
20.	Jeffrey Epstein's passport (or copy)	12
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12

No.	Edwards' Exhibit Description	Epstein's Objections
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home	3, 4, 7, 8, 10,
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation	3, 4, 7, 8, 10, 11, 14
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12
32.	List of properties and vehicles in Larry Visoski's name	3, 4, 7, 8, 11, 13, The exhibit provided was an entire Motion (which was denied) not just the identified item.
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13
36.	All Complaints in which Jeffrey Epstein is/was a plaintiff or defendant	3, 4, 11, 12, 13. This also includes a motion which is not part of the stated exhibit.
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB	3, 4, 11, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG	3, 4, 11, 12, 13
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10
46.	Victim Notification Letter from US Attorney's Office to Victim	3, 4, 7, 8, 14
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8,
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant	3, 4, 7, 8, 12
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13
59.	Massage Table	3, 4, 12 (document marked as No. 59 is not a massage table)
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13

No.	Edwards' Exhibit Description	Epstein's Objections
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8
69.	List of planes owned by Jeffrey Epstein	3, 4, 7, 8, 12 (document provided does not match description), 14
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13
77.	Documents related to the rental of a vehicle for Vanessa Zalis	3, 4, 7, 8, document produced contains other items not identified on list
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11
91.	Jeffrey Epstein notepad notes.maria	3, 4, 7, 8, 10, 12
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10
96.	Victim's school records and transcripts	3, 4, 7, 8
97.	Victim Notification letter dated 7-9-08	3, 4, 7, 8
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12
102.	All items listed on the Palm Beach Police Property Report Lists	3, 4, 7, 8, 12 (items not provided)
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,

No.	Edwards' Exhibit Description	Epstein's Objections
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto	3, 4, 7, 8, 12, 13
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause	3, 4, 7, 8, 12, 13
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits	12
109.	Edwards' reserves all objections to Epstein's Exhibits	Not an exhibit
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.	3, 4, 7, 8, 12, 13
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez	3, 4, 7, 8, 11, 14 (duplicative of Exhibit No. 8)
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45

No.	Edwards' Exhibit Description	Epstein's Objections
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009	
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013	3, 4, 7, 13
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012	
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8
133.	Any and all responses to Subpoenas Duces Tecum with or without deposition	3, 4, 6, 7, 8, 10, 11, 12 (document produced not reflective of the description), 13, 14
134.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12 (document produced not reflective of the description), 13
135.	Any and all documents produced in this action.	12
136.	Any and all depositions taken in this action.	12 (document provided is not reflective of description), 13
137.	Any documents or other exhibit attached to or used during any deposition in this action	12 (document provided is not reflective of description), 13
138.	Any and all exhibits, documents, etc. referred to in any deposition	12 (document provided is not reflective of description), 13
139.	Any and all documents and exhibits designated by all parties to this action.	12 (document provided is not reflective of description), 13
140.	Any and all exhibits needed for impeachment or rebuttal	12 (document provided is not reflective of description)

No.	Edwards' Exhibit Description	Epstein's Objections
141.	Any and all pleadings filed in this action	12 (document provided is not reflective of description), 13
142.	Any and all records produced or that will be produced by all records custodians relative to this action	12 (document provided is not reflective of description), 13

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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By: /s/ Scott J. Link

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APP. 35

NOT A CERTIFIED COPY

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,

_____ /

SEVENTH AMENDED AND SUPPLEMENTAL WITNESS LIST
OF COUNTER-PLAINTIFF BRADLEY J. EDWARDS

Counter-Plaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys,
hereby supplements his list of witnesses for trial as follows:

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- 2.. Jeffrey Epstein
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5. Virginia Roberts Guiffre
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7. Annie Farmer
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12. Chief Michael Reiter
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18. Records Custodian of United States Attorney's Office
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19. Records Custodian of the Federal Bureau of Investigations
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75. Matt Weissing
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77. Any additional individuals identified as victims by the United States Attorney's Office and whose identities were conveyed to Jeffrey Epstein as part of a list supplied as it related to the NPA.
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79. President Donald J. Trump
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80. Larry Visoski
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81. Maritza Vasquez
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89. Russell Adler
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90. Marie Alessi
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91. Janusz Banasiak
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103. Officer Minot
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139. Steven Hoffenberg
Address Currently Unknown
140. Michael Stroll
Address Currently Unknown
141. Douglas Shoettle
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142. Ghislaine Maxwell
Address Currently Unknown
143. Amazon Records Custodian
144. Yellow Cab Records Custodian

145. Citrix Systems, Inc. Records Custodian
146. Federal Bureau of Investigation Records Custodian
147. Milton Girls Juvenile Facility Records Custodian
5770 East Milton Road
Milton, FL
148. School District of Palm Beach County Records Custodian
3344 Forest Hill Blvd., Suite C-124
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149. St. Mary's Medical Center Records Custodian
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West Palm Beach, FL 33401
150. Wellington Reginal Hospital Records Custodian
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Wellington, FL 33414
151. All witnesses that Defendants have listed on their Witness List not objected to by Plaintiff.
152. All rebuttal witnesses.
153. All People on Jeffrey Epstein's Inmate Visitor Log while he was in jail.

WITNESS TESTIMONY EXPECTED TO BE PRESENTED
BY MEANS OF DEPOSITION

154. Mark Epstein
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155. Adriana Ross (Adriana Mucinska)
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156. Louella Rabuyo
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157. Alfredo Rodriguez

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159. Jeffrey Epstein

160. Courtney Wild
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EXPERT WITNESSES

161. Bernard J. Jansen, Ph.D.
c/o Jack Scarola
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The following witnesses are attorneys that are not retained or specially employed to provide expert testimony, but may provide opinions relating to the propriety of Brad Edward's conduct of discovery in the prosecution of the Epstein claims.

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Plaintiff reserves the right to amend this list.


EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 20 of 22

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 9th day of November, 2017.



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EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

Page 21 of 22

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EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

Page 22 of 22

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APP. 36

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE 15TH 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).

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

January 25, 2012

9:34 a.m. - 10:03 a.m.

SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY, PA
2139 Palm Beach Lakes Boulevard
West Palm Beach Florida 33409

Stenographically Reported By:
Tammy Nestor, RPR

1 MR. KNIGHT: Okay.

2 MR. SCAROLA: -- that's intended to coach
3 the witness, Mr. Knight.

4 MR. KNIGHT: I'm going to object.

5 MR. SCAROLA: So if you say you are
6 objecting on the basis that it calls for a
7 legal conclusion, that's fine. And now I would
8 like the witness's answer unless you are
9 instructing him not to answer.

10 MR. KNIGHT: I'm not instructing him not
11 to answer.

12 BY MR. SCAROLA:

13 Q Okay. Then would you please answer the
14 question?

15 A I'm sorry. Would you repeat it?

16 Q Yes, sir. Is it your contention that
17 Bradley Edwards abusively prosecuted the federal
18 court action on behalf of LM?

19 A (Yes, sir.)

20 Q (How?)

21 A (Bradley Edwards filed a 234-count federal
22 complaint in conjunction with his partner Scott
23 Rothstein to enable his partners at RRA to defraud
24 south Florida investors of millions of dollars.
25 (His partner Scott Rothstein and his partner

1 (Mr. Adler have -- excuse me, (Mr. Rothstein has now in
2 deposition admitted that they needed to file a complaint) to
3 show investors that there was real action, (in
4 Mr. Rothstein's words, (going on in federal court. (The
5 investors had not been able to find a (filed complaint and
6 had complained to Mr. Rothstein that there was no filed
7 complaints two days, (excuse me, (before Mr. Edwards filed
8 the federal complaint for 234.)

9 Q (Were you ever served with that complaint?)

10 (A (Not to the best of my recollection.)

11 Q (So one contention is that Mr. Edwards
12 abusively prosecuted a federal court action on
13 behalf of LM with which you were never served,
14 correct?)

15 (A (I had -- I was notified that the case was,
16 in fact, (filed.)

17 Q (But you were never served with the case,
18 correct?)

19 (A (I was notified that the case was filed.)

20 Q (But you were never served with the case,
21 correct?)

22 (A (Not to the best of my recollection.)

23 Q (Okay. What damage did you incur as a
24 consequence of the filing of a complaint with which
25 you were never served?)

1 A (I incurred many legal -- much legal fees,
2 many legal fees, in fact, to try to figure out
3 why -- what was going on and, in fact, getting
4 prepared to defend the case though I had not yet
5 been served.)

6 (Q (Were the allegations in the federal
7 complaint on behalf of LM any different than the
8 allegations in the state court case on behalf of LM?)

9 (A (I don't recall.)

10 Q Did you, in fact, engage in any sexual
11 conduct with LM?

12 A I'm sorry, but I'm sure -- the jury is
13 going to recognize this is simply meant to harass
14 me, and I'll have to take the Fifth Amendment since
15 your client, Mr. Edwards, is trying to overturn my
16 prosecution agreement.

17 Q How many times did you engage in sexual
18 conduct with LM?

19 A I'm going to have to invoke my Fifth
20 Amendment right again, sir.

21 Q Do you know who LM is?

22 A Again I'm going to assert my right.

23 MR. KNIGHT: We are going to go off the
24 record and take another break.

25 THE VIDEOGRAPHER: The time is 9:58. We