

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

12 JAN 26 PH 3:42
FILED
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CLERK

MOTION TO COMPEL AND IMPOSE SANCTIONS

Defendant/Counterplaintiff, BRADLEY J. EDWARDS (EDWARDS), by and through his undersigned attorneys, moves this Honorable Court to compel the deposition testimony of Plaintiff/Counterdefendant, JEFFREY EPSTEIN (EPSTEIN), and in support would show:

1. by prior Order of this Court, EPSTEIN was required over his objection to submit to a deposition in this matter;
2. the duly noticed deposition commenced as scheduled at approximately 9:30 a.m. on January 25, 2012;
3. at approximately 10:00 a.m. after having repeatedly recessed the proceedings to conduct private conferences, and having repeatedly refused to answer relevant and material questions directly related to the claims previously brought by him and the claim currently pending against EDWARDS, EPSTEIN unilaterally and without good cause terminated the deposition;

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4. the proceedings and the circumstances of the termination will be accurately reflected in the transcript to be provided to the Court immediately upon receipt;
5. the unjustified termination of the deposition is part of EPSTEIN's overall strategy to prolong these proceedings and use them to inflict maximum damage on EDWARDS by diverting his attention from his professional and personal responsibilities including his prosecution of pending claims against EPSTEIN in this action and on behalf of clients in Federal court;
6. it is further his obvious purpose to attempt to punish EDWARDS so as to deter him and others from seeking to hold EPSTEIN civilly and criminally responsible for his serial abuse of minors;
7. EPSTEIN's vast wealth renders financial sanctions practically meaningless as a means to require him to conform his conduct to the rules of procedure in this action;
8. nevertheless, both EDWARDS and his counsel should be compensated for all losses sustained and costs incurred in the taking of the aborted deposition and the prosecution of this motion;
9. EPSTEIN should be compelled immediately to make himself available to conclude the deposition at the sole convenience of EDWARDS and his counsel;
10. EPSTEIN should be held in indirect civil contempt of court, a 90 day coercive jail sentence should be imposed against him, and as required by applicable law in the context of civil contempt, the sentence should be suspended upon condition that the compensatory fine is paid and the deposition is properly and timely concluded.

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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and U.S. Mail to all Counsel on the attached list, this 25 day of January, 2012.


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