

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

JEFFREY EPSTEIN

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

Plaintiff,

Case No. 50 2009CA040800XXXMB AG

v.

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

Defendants.

REPLY TO AFFIRMATIVE DEFENSES OF DEFENDANT, L.M.

Plaintiff, JEFFREY EPSTEIN, (hereinafter "EPSTEIN"), by and through the undersigned attorneys, responds to the affirmative defenses and denies each and every allegation therein, and demands strict proof thereof. Specifically, the Defendant, L.M., has failed to set forth any facts which would support an estoppel and/or waiver argument in its affirmative defense and those defenses should therefore be stricken.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S.

Mail to the following addressees on this 12<sup>th</sup> day of January, 2010:

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