

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).

REQUEST TO PRODUCE TO PLAINTIFF, JEFFREY EPSTEIN

Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Plaintiff, Jeffrey Epstein, produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

1. Current curriculum vitae for every individual who has provided services in the referenced matter for which services the Plaintiff seeks reimbursement.
2. Each hourly fee contract pursuant to which each of the above-referenced individuals has billed for services during the same period for which the Plaintiff seeks reimbursement for services in this matter, including but not limited to all contracts for services in this matter.
3. All documents* constituting, reflecting, supporting, or referencing contemporaneous records of the time spent and nature of services rendered in this matter.
4. All documents* constituting, reflecting, supporting or referencing the reconstruction of the time spent and nature of services rendered in this matter.

5. All documents* constituting, reflecting or referencing the policies, practices, and procedures pursuant to which records were generated and kept of the time spent and nature of services rendered by each of the individuals referenced in Request #1.

6. All documents* constituting, reflecting or referencing efforts to identify any duplication of services in this matter among the multiple attorneys who have rendered services for which the Plaintiff seeks reimbursement.

7. All documents* constituting, reflecting or referencing any and all payments for services for which the Plaintiff seeks reimbursement including the date, source, and amount of each payment.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach

EDWARDS ADV. EPSTEIN
Case No.: 502009CA040800XXXXMBAG
Request to Produce to Jeffrey Epstein

Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

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 14th day of July, 2015.



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