

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 -9 PM 4:19  
FILED  
SHARON R. COOK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 4

**PLAINTIFF'S RESPONSE TO REQUEST TO PRODUCE**

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned attorney and pursuant to Rule 1.350, Florida Rules of Civil Procedure, hereby respond to Plaintiff/Counterdefendant, Jeffrey Epstein's, Request to Produce dated December 9, 2011 as follows:

1. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
2. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.
3. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

4. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

5. Objection. The identification of documents "that tend to support" a specific claim would require a disclosure of the mental impressions and thought processes of counsel and is accordingly protected by the work-product privilege.

Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

6. The only responsive documents are:

- the original and amended Complaints in this action
- Epstein's Motion to Depose Rothstein (with attachments and certificate of service) filed in the RRA bankruptcy proceedings
- bankruptcy filings and hearing transcripts all of which are already in the possession of Epstein and his counsel

7. None

8. Invoices reflecting expenses incurred in defense of this lawsuit are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

9. Responsive documents are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

10. None

11. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

12. None

13. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

14. None

15. Records reflecting the amount of time which Bradley Edwards has been obliged to devote to the defense of Epstein's malicious, abusive, and baseless legal actions against Bradley Edwards are available for inspection and copying at the offices of Bradley Edwards' counsel at any mutually convenient time determined by prior arrangement.

16. Objection. Attorney work product privilege

17. Objection. Attorney work product privilege

18. Objection. Overly broad, not reasonably calculated to lead to the discovery of admissible evidence, privileged pursuant to Bradley Edwards' right and the rights of his clients, law partners, and associates to economic privacy, and in some circumstances subject to contractual confidentiality provisions.

19. Objection. Attorney work product privilege except to the extent that Bradley Edwards is identified as a source of information in published reports which are as easily available to Jeffrey Epstein as to Bradley Edwards through internet searches.

20. None

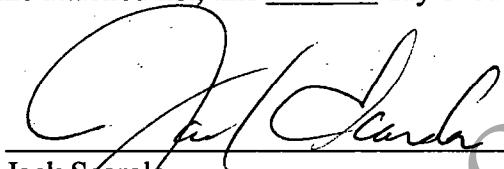
21. None

22. None except to the extent that pending Victims Rights Act proceedings fall within the description of this request. Pleadings in that matter are public records readily available to Jeffrey Epstein.

23. See Bradley Edwards' Motion for Summary Judgment and attachments thereto and all pleadings and filings in the state and federal criminal proceedings against Epstein and in each of the civil claims brought against and settled by him—all of which are already in the possession of Epstein and/or the members of the various law firms who do and have represented him.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Plaintiff(s) Response to Request to Produce

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 6<sup>th</sup> day of January, 2012.

  
\_\_\_\_\_  
Jack Scarola  
Florida Bar No.: 169440  
Searcy Denney Scarola Barnhart & Shipley, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida 33409  
Phone: (561) 686-6300  
Fax: (561) 383-9451  
Attorney for Bradley J. Edwards

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Plaintiff(s) Response to Request to Produce

**COUNSEL LIST**

Jack A. Goldberger, Esquire  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561) 659-8300  
Fax: (561) 835-8691

Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, PL  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954) 524-2820  
Fax: (954) 524-2822

Marc S. Nurik, Esquire  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954) 745-5849  
Fax: (954) 745-3556

Joseph L. Ackerman, Jr., Esquire  
Fowler White Burnett, P.A.  
901 Phillips Point West  
777 S Flagler Drive  
West Palm Beach, FL 33401-6170  
Phone: (561) 802-9044  
Fax: (561) 802-9976