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

CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

-vs-

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

Defendants/Counter-Plaintiffs.
_____/

**RESPONSE TO PLAINTIFF'S MOTION TO AMEND ANSWER AND AFFIRMATIVE DEFENSES**

Defendant/Counter-Plaintiff, Bradley J. Edwards, hereby files this Response to the Motion to Amend Answer and Affirmative Defenses filed by Plaintiff/Counter-Defendant Jeffrey Epstein. For the reasons stated below, the motion should be denied.

Eight years after this lawsuit was filed and just prior to a special set trial date, Epstein has filed a motion to amend to raise five new affirmative defenses. No explanation has been offered as to why Epstein waited eight years to raise these defenses.

This court is authorized to deny such a motion on any of three grounds: that the amendment would prejudice the opposing party, that the privilege to amend has been abused, or that the amendment would be futile. Vaughn v. Boerckel, 20 So.3d 443, 445 (Fla. 4th DCA 2009). Each of those three grounds exists here.

Allowing Epstein to amend his answer to raise five new affirmative defenses would clearly prejudice Edwards since those affirmative defenses raise multiple factual issues which would require additional discovery, expert witnesses, and possibly even counterpleading by Edwards. Additionally, Epstein has abused the privilege to amend by failing to raise these affirmative defenses until eight years into the case, especially since he has made no attempt to justify that delay. On each of those grounds alone, this Court should deny his Motion to Amend. See Levine v. United Companies Life Ins. Co., 659 So.2d 265 (Fla. 1995); Brown v. Montgomery Ward, 252 So.2d 817, 819 (Fla. 1st DCA 1971).

Independent of that, this Court should also deny Epstein's Motion to Amend because two of the proposed "affirmative defenses" are not even affirmative defenses at all; and the other three are, as a matter of law, not valid defenses to a malicious prosecution claim. Thus, the amendments would be futile. See McCray v. Bellsouth Telecommunications, Inc., 213 So.3d 938 (Fla. 4th DCA 2017).

In State v. Cohen, 568 So.2d 49, 51-52 (Fla. 1990), the Florida Supreme Court defined an affirmative defense as follows:

> An "affirmative defense" is any defense that assumes the complaint or charges to be correct but raises other facts that, if true, would establish a valid excuse or justification or a right to engage in the conduct in question.

Here, none of Edwards' five proposed affirmatives defenses provide a valid excuse or justification for the filing of his baseless litigation against Edwards. This will be discussed in more detail infra.

It should also be noted that a fundamental premise of three of the five proposed affirmatives defenses is that Edwards' claim is not really for malicious prosecution, but is really a defamation claim, which might be subject to these new affirmative defenses. However, Edwards has never alleged a defamation claim against Epstein arising from the circumstances at issue here. Additionally, the Fourth District has specifically ruled that Epstein's claim of litigation privilege was invalid because it does not apply to a malicious prosecution claim, although it does apply to a defamation claim, Edwards v. Epstein, 178 So.3d 942 (Fla. 4th DCA 2015); and the Florida Supreme Court ruled the same way, see Debrincat v. Fischer, 217 So.3d 68 (Fla. 2011). Therefore, as discussed in more detail infra, Epstein cannot convert Edwards' malicious prosecution claim into a defamation cause of action in order to justify these untimely and inapplicable defenses.

**The Fifth Affirmative Defense**

Epstein contends his underlying lawsuit against Edwards was a "form of petitioning government for redress" and therefore Edwards cannot prevail unless

he can show that Epstein's lawsuit was a "sham" under the Noerr-Pennington doctrine. This proposed affirmative defense is invalid as a matter of law on multiple levels.

United Mine Workers v. Pennington, 381 U.S. 657 (1965), and Eastern Railroad Presence Conference v. Noerr Motor Freight, Inc., 365 U.S. 127 (1961), both involved claims of antitrust violations under the federal Sherman Act, 15 U.S.C. §1-7. The conduct at issue was a public relations campaign and lobbying efforts designed to cause legislative and executive branches of government to enact anticompetitive laws. The Supreme Court held that unless those efforts were proven to have been a "sham," they were protected from being antitrust violations by the First Amendment right to petition the government. At this point it is reasonable to ask what those decisions have to do with a malicious prosecution case, and the simple answer is—nothing. Neither Noerr nor Pennington addressed petitioning the government in judicial forums, which is governed by a different standard and which is completely inapplicable to Epstein's baseless lawsuit against Edwards.

The United States Supreme Court has made it clear that baseless litigation is not entitled to any protection under the First Amendment right to petition. In Bill Johnson's Restaurants, Inc. v. National Labor Relations Board, 461 U.S. 731, 743 (1983), the Court stated:

> Just as false statements are not immunized by the First Amendment right to freedom of speech, see Herbert v. Lando, 441 U.S. 153, 171, 99 S.Ct. 1635, 1646, 60 L.Ed.2d 115 (1979); Gertz v. Robert Welch, Inc., 418 U.S. 323, 340, 94 S.Ct. 2997, 3007, 41 L.Ed.2d 789 (1974), **baseless litigation is not immunized by the First Amendment right to petition.** [Emphasis added]

The Court has also distinguished judicial proceedings from petitioning activity of the legislature and executive branch in the context of the Noerr-Pennington doctrine in California Motor Transport Co. v. Trucking Unlimited, 404 U.S. 508, 513 (1972), stating:

> Misrepresentations, condoned in the political arena, are not immunized when used in the adjudicatory process.

Here, Edwards' malicious prosecution claim alleges that Epstein's lawsuit against him was baseless. As the Florida Supreme Court has stated, an affirmative defense assumes the truth of the claim alleged, and raises a valid excuse or justification for that conduct. Cohen, supra. Since Edwards alleges that Epstein's suit was baseless, and the U.S. Supreme Court has ruled that baseless litigation receives no protection from the First Amendment right to petition, Epstein's proposed Fifth Affirmative Defense does not, as a matter of law, state a valid defense.

Epstein's proposed Fifth Affirmative Defense is also fatally defective in contending that the "sham" test must be used to evaluate Epstein's lawsuit. The

Florida Supreme Court has unequivocally rejected that standard in Londono v. Turkey Creek, Inc., 609 So.2d 14, 18 (Fla. 1992):

> We decline to adopt the "sham" test because we find that the current law in Florida already provides protection for the First Amendment right to petition the government.

Moreover, the analysis in Londono is consistent with the argument made above, i.e. that the right to petition under the First Amendment of the Federal Constitution, or Article I, §5, of the Florida Constitution has no application to immunize nor limit a malicious prosecution claim.

Londono involved a conflict between a homeowners' association and a developer. The homeowners' association filed a civil action against the developer, and also lobbied local zoning officials to take positions adverse to the developer. The developer prevailed in the civil action and then brought a claim for malicious prosecution and numerous other torts against the homeowners' association. The Florida Supreme Court first determined whether the developer could maintain a malicious prosecution action against the homeowners, and determined that claim was viable. 609 So.2d at 16-18. Thereafter, the Florida Supreme Court considered whether the other allegedly tortious conduct of the homeowners was protected by the First Amendment right to petition the government. However, the Court specifically did not include the malicious prosecution claim within that analysis, obviously recognizing that defense was inapplicable to such tortious conduct. Id. at

18. In that analysis, the Florida Supreme Court specifically declined to adopt the "sham" test to determine whether the homeowners' lobbying conduct was protected by the First Amendment right to petition, but instead followed its prior decision in Nodar v. Galbreath, 462 So.2d 803 (Fla. 1984).

In Nodar, the Florida Supreme Court held that where a citizen was sued for statements made at a public school board meeting, the right to petition justified a qualified privilege with respect to defamation. But the Court ruled that qualified privilege only "eliminated the presumption of malice attaching to defamatory statements by law." 462 So.2d at 810. However, there is no presumption of "malice" in a malicious prosecution case,[1] as it is a separate element of the tort which the plaintiff must prove. Fischer v. Debrincat, 169 So.3d 1204, 1206 (Fla. 4th DCA 2014), approved, 217 So.3d 68 (Fla. 2017). As noted by Justice Scalia, a malicious prosecution claim incorporates a qualified privilege within its elements, Kalina v. Fletcher, 522 U.S. 118, 133 (1997) (Scalia, J. concurring):

> At common law, therefore, Kalina would have been protected by something resembling qualified immunity if she were sued for malicious prosecution. The tortious act in such a case would have been her decision to bring criminal charges against Fletcher, and liability would attach only if Fletcher could prove that the prosecution was malicious, without probable cause, and ultimately unsuccessful.

[1] As noted in other filings, Edwards acknowledges that in malicious prosecution cases, malic can be inferred from; inter alia; lack of probable cause, gross negligence, or great indifference to persons on the rights of others. see Durkin v. Davis, 814 So.2d 1246, 1248 (Fla. 2nd DCA 2002). However, there is no presumption of malice in malicious prosecution cases.

Thus, Nodar, cited in Epstein's proposed Fifth Affirmative Defense, is inapplicable here, since malice is not presumed in a malicious prosecution action.

Finally, Epstein's proposed Fifth Affirmative Defense is fatally defective because his filing of RICO, civil theft, and extortion charges against Edwards does not fall within the scope of the right to petition **the government**. In Gertz v. Robert Welch, Inc., 418 U.S. 323, 350 (1974), the Court rejected the contention that private attorneys, as officers of the court, are "public officials" for purposes of the First Amendment. The Court stated:

> Respondent's suggestion would sweep all lawyers under the New York Times rule as officers of the court and distort the plain meaning of the 'public official' category beyond all recognition. We decline to follow it.

Furthermore, in Nodar, supra, the Florida Supreme Court followed Gertz and concluded that the public school teacher was neither an elected nor policy making official sufficient to trigger First Amendment protection, even though she was a government employee. Thus, as a matter of law, Epstein's underlying suit against Edwards cannot constitute petitioning the government for purposes of the First Amendment or Article I, §5, of the Florida Constitution.

**Sixth, Seventh, and Eighth Affirmative Defenses**

Epstein's proposed Sixth, Seventh, and Eighth Affirmative Defenses are all premised on his contention that "Edwards' claims are nothing more than

defamation claims which are barred by defenses applicable to defamation claims" (Proposed Answer p.10). That premise is wrong and therefore all three defenses, which can apply only to defamation actions, are invalid as a matter of law.

The fundamental flaw in these three affirmative defenses is Epstein's characterization of Edwards' claim as "nothing more than defamation." Edwards' counterclaims in this proceeding have never included a count for defamation. Moreover, malicious prosecution is indisputably a separate and independent tort. Additionally, Epstein's prior attempt to defeat Edwards' claim based on a defense to defamation was unsuccessful as a matter of law.

Previously in this case, Epstein moved for summary judgment arguing, inter alia, that the litigation privilege, which is an absolute bar to a defamation claim, barred Edwards' malicious prosecution claim. This Court granted summary judgment, but was reversed by the Fourth District based on its determination that the Third District precedent this Court relied upon should not be followed. Edwards v. Epstein, 178 So.3d 942 (Fla. 4th DCA 2015). Epstein sought review in the Florida Supreme Court, but became a "tag along" case to Debrincat v. Fisher, No. SC15-1477. In Debrincat, the Florida Supreme Court ruled that the litigation privilege did not apply to bar or limit a malicious prosecution claim. Debrincat v. Fisher, 217 So.3d 68 (Fla. 2017).

Thereafter, the Supreme Court issued an order to show cause directing Epstein to show why Debrincat was not controlling in this case (Exhibit A). Epstein responded and conceded that "the petitioner would show no cause why Debrincat is not controlling …" (Exhibit B). As a result, the Supreme Court declined review. Therefore, Epstein conceded that this action is a malicious prosecution claim which, unlike a defamation claim, is not barred nor limited by the litigation privilege. Nonetheless, he now attempts to convert Edwards' claim into a defamation claim in order to raise multiple affirmative defenses.

Epstein attempts to justify this "conversion" by string citing cases for the proposition that "a plaintiff may not avoid defenses that apply to defamation actions by characterizing them as torts which are not subject to those restrictions." (Proposed Answer p.10-11). Those cases do not support Epstein's position because none of them involve malicious prosecution claims in which the plaintiff properly alleged all elements of that tort. The cases relied upon by Epstein all involve the "single publication/single action rule" which prohibits multiple claims arising from a single publication upon which a failed defamation claim was based. E.g., Calloway Land & Cattle Co., Inc. v. Banyon Lakes C. Corp., 831 So.2d 204, 208 (Fla. 4th DCA 2002). There was no "failed defamation claim" in the case sub judice, and thus that rule does not apply. Furthermore, none of the cases cited by

Epstein involved circumstances in which a valid malicious prosecution claim was at issue.

Also, as noted in Calloway Land, there are two exceptions to the application of the "single publication/single action rule," both of which apply in this case. First, where a plaintiff pleads facts and circumstances other than the defamatory statement to support the independent tort, the rule does not apply. See Primarica Financial Services, Inc. v. Mitchell, 48 F.Supp 2d 1363 (S.D. Fla. 1999) (cited in Calloway Land, 831 So.2d at 209). Here, Plaintiff has pled other facts and circumstances since he has successfully pled the independent tort of malicious prosecution. Therefore the "single publication/single action rule" does not apply, as a matter of law.

A second exception to the rule is where the plaintiff did not have a defamation claim. See Heekin v. CBS Broadcasting, Inc., 789 So.2d 355 (Fla. 2d DCA 2001) (cited in Calloway Land, 831 So.2d at 209), disapproved on other grounds by Anderson v. Gannett Co., Inc., 994 So.2d 1048 (Fla. 2008). Here, Edwards has never alleged a defamation claim against Epstein. Moreover, such a claim would have been foreclosed by the litigation privilege which, the Florida Supreme Court has held, does not bar Edwards' malicious prosecution claim. Debrincat, supra.

Based on the above, Epstein's proposed Sixth Affirmative Defense and Seventh Affirmative Defense, which raise defenses solely applicable to defamation claims, are inapplicable, as a matter of law, in this case.

Additionally, the proposed Sixth Affirmative Defense, which contends that Edwards is a "general or limited purpose public figure," fails as a matter of law for another reason. In Gertz, supra, the United States Supreme Court rejected the contention that a private attorney representing a private client in litigation matters became a public figure, even though there was significant publicity surrounding the case. Here, Edwards did nothing to inject himself into any public controversy relevant to Epstein's lawsuit against him and, as the Court in Gertz stated (418 U.S. at 352):

> We would not lightly assume that a citizen's participation in community and professional affairs rendered him a public figure for all purposes.

The court in Gertz concluded that the petitioner, a private attorney, was not a public figure since "his participation related solely to his representation of a private client." 418 U.S. at 352.

For the same reason, Epstein's contention in his proposed Seventh Affirmative Defense that the matters relevant to Epstein's initial lawsuit "involve a matter of public concern" is invalid. That position is contradicted by the one case Epstein relies upon, Gertz, supra. Therefore, in addition to being a defense to a

different tort, the proposed Seventh Affirmative Defense does not apply as a matter of law.

Epstein's proposed Eighth Affirmative Defense is not actually an affirmative defense. It only contains his legal argument that Edwards' claims are "nothing more than defamation claims which are bared by defenses applicable to defamation claims as set forth in the defenses above" (Proposed Answer p.10). As a result, it is not an affirmative defense as defined in Cohen, supra, but is only a statement of a legal proposition. Therefore, allowing Epstein to amend his answer to include it as an affirmative defense would be futile.

**Ninth Affirmative Defense**

In his proposed "Ninth Affirmative Defense" Epstein contends common law and statutory principles that govern awards of punitive damages are "not sufficient to assure Epstein due process of law." On a threshold level, this is not an affirmative defense; it is a constitutional challenge to the validity of this Court's proceedings. Therefore, denial of leave to amend is warranted.

Epstein's proposed "Ninth Affirmative Defenses" does not establish a valid excuse or justification for engaging in the conduct alleged in Edwards' counterclaim as required by Cohen, supra. Instead, it contents that this Court is incapable of providing due process to him in these proceedings as to any award of punitive damages. Epstein does not specify any past proceedings in which this

Court violated his right to due process with respect to the punitive damages, nor does he identify any possible future proceedings that would violate his due process rights. Thus, the argument he raises is premature but, more importantly, it is not an affirmative defense, as a matter of law. Therefore, there is no basis for this Court to grant him leave to amend his answer to the counterclaim to add it as an affirmative defense.

Edwards would note that there are multiple procedures in place to protect a defendant's due process rights in proceedings relating to punitive damages.

The Florida Supreme Court has considered due process principles and has established procedures by which the rights of the defendant will be preserved when litigating punitive damages claims. W.R. Grace & Co.–Conn. v. Waters, 638 So.2d 502, 506 (Fla. 1994). There, the Court held:

> When presented with a timely motion, should bifurcate the determination of the amount of punitive damages from the remaining issues at trial. At the first stage of a trial in which punitive damages are an issue, the jury should hear evidence regarding liability for actual damages, the amount of actual damages, and liability for punitive damages, and should make determinations on those issues. If, at the first stage, the jury determines that punitive damages are warranted, the same jury should then hear evidence relevant to the amount of punitive damages and should determine the amount for which the defendant is liable. At this second stage, evidence of previous punitive awards may be introduced by the defendant in mitigation.

Id. at 506. These procedures are meant to eliminate the possibility that a defendant will be prejudiced during the liability phase of the case with presentation of evidence related to the determination of the amount of punitive damages.

The procedures established by the Florida Supreme Court in W.R. Grace have been applied consistently to ensure the due process rights of defendants are met. See, e.g., Persaud v. Cortes, 219 So.3d 241, 242 (Fla. 5th DCA 2017); GEICO Gen. Ins. Co. v. Dixon, 209 So.3d 77, 81 (Fla. 3d DCA 2017), review denied, No. SC17-94, 2017 WL 1732993 (Fla. May 3, 2017); St. Paul Mercury Ins. Co. v. Coucher, 837 So.2d 483, 488 (Fla. 5th DCA 2002); Owens-Corning Fiberglas Corp. v. Ballard, 749 So.2d 483, 484 (Fla. 1999); Dessanti v. Contreras, 695 So.2d 845, 847 (Fla. 4th DCA 1997); Soliday v. 7-Eleven, Inc., No. 2:09-CV-807-FTM-29, 2011 WL 2413656, at *1 (M.D. Fla. June 13, 2011); see also Owens-Corning Fiberglas Corp. v. Rivera, 683 So.2d 154, 156 (Fla. 3d DCA 1996) (finding no due process violation as to punitive damage award where defendant did not avail itself of the "protection offered by the option of bifurcation"). There is no reason why the bifurcation process could not also be applied here to ensure that Epstein's due process rights are preserved.

There are also post-trial procedures available to protect the due process rights of a defendant. See State Farm Mut. Auto. Ins. Co. v. Campbell, 538 U.S. 408, 416 (2003); BMW of N. Am., Inc. v. Gore, 517 U.S. 559 (1996). These

procedures have been applied consistently to protect the due process rights of defendants where a grossly excessive or arbitrary punitive damage award is awarded. See, e.g., Campbell, supra; Engle v. Liggett Group, Inc., 945 So.2d 1246, 1263 (Fla. 2006); R.J. Reynolds Tobacco Co. v. Townsend, 90 So.3d 307, 316 (Fla. 1st DCA 2012); Langmead v. Admiral Cruises, Inc., 696 So.2d 1189, 1194 (Fla. 3d DCA 1997).

Finally, the Florida Legislature has enacted a statutory scheme granting protection to defendants in pretrial and post-trial proceedings. See §§768.72, 768.725, 768.73, Fla. Stat. Epstein has failed to identify any shortcoming in this legislative scheme or the procedures adopted by the Florida Supreme Court which subject him to any violation of his due process rights.

Therefore, for the reasons stated above, Epstein's Motion to Amend Answer and Affirmative Defenses should be denied.

I HEREBY CERTIFY that a true copy of the foregoing was furnished to all counsel on the attached service list, by email, on November 22, 2017.

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Case No. 502009CA040800XXXXMB

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# Supreme Court of Florida

WEDNESDAY, MAY 3, 2017

**CASE NO.: SC15-2286**
Lower Tribunal No(s).:
4D14-2282; 502009CA040800XXXXMB

JEFFREY EPSTEIN vs. BRADLEY J. EDWARDS, ET AL.

Petitioner(s) Respondent(s)

Petitioner shall show cause on or before May 18, 2017, why this Court's decision Debrincat v. Fischer, 42 Fla. L. Weekly S141 (Fla. Feb. 9, 2017), is not controlling in this case and why the Court should not decline to exercise jurisdiction in this case. Respondent may serve a reply on or before May 29, 2017.

A True Copy
Test:

John A. Tomasino
Clerk, Supreme Court

two
Served:

WILLIAM B. KING
PAUL MORRIS
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TONJA B HADDAD
W. CHESTER BREWER, JR.
JACK ALAN GOLDBERGER



Exhibit A

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC15-2286

JEFFREY EPSTEIN,

Petitioner,

v.

BRADLEY J. EDWARDS, et al.,

Respondents.
_____/

**PETITIONER'S RESPONSE TO ORDER TO SHOW CAUSE**

The petitioner responds as follows to this Court's order dated May 3, 2017:

1. On May 3, 2017, this Court issued an order directing the petitioner to show cause on or before May 18, 2017 why this Court's decision in *Debrincat v. Fischer*, 42 Fla. L. Weekly S141 (Fla. Feb. 9, 2017), is not controlling in this case and why the Court should not decline to exercise jurisdiction in this case.

2. In response to the show cause order, the petitioner would show no cause why *Debrincat* is not controlling as to the basis for this Court's jurisdiction, and no cause why this Court should not decline to exercise jurisdiction.

Respectfully submitted,

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Exhibit B

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that this response was emailed to counsel on the list below this 18th day of May, 2017.

s/ *Paul Morris*
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