

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

**MOTION TO LIFT CONFIDENTIALITY DESIGNATION OF EPSTEIN'S
DISCLOSURE OF CONFIDENTIAL SETTLEMENT INFORMATION**

Counter-Plaintiff, Bradley J. Edwards, by and through undersigned counsel, hereby files this Motion to Lift Confidentiality Designation of Epstein's Disclosure of Confidential Settlement Information pursuant to the Court's Order Compelling Epstein to Produce Settlement Amounts dated January 5, 2018, and as grounds therefore states as follows:

1. On January 5, 2018, the Court entered its Order Compelling Epstein to Produce Settlement Amounts, which required Epstein to produce, for attorneys' and client's eyes only, the following information: (a) the number of sexual abuse claims that Epstein settled in the two years prior to December 7, 2009; (b) the aggregate settlement monies paid for the cases settled in the two years prior to December 7, 2009; (c) the number of sexual abuse claims that Epstein settled after December 7, 2009; and (d) the aggregate settlement monies paid for the cases settled after December 7, 2009. A copy of the Court's Order is attached hereto as Exhibit 'A'.

2. On January 24, 2018, Epstein produced this court-ordered information to Edwards by way of a document titled 'Confidential, for Attorneys' and Client's Eyes Only Epstein's Disclosure of Confidential Settlement Information.'

3. Pursuant to paragraph 3 of the Order, Edwards is required to file an appropriate motion to lift the confidentiality designation prior to using any of this information during future hearings or at trial. See Ex. 'A'.

4. Edwards now seeks to lift the confidentiality designation concerning the aggregate number of claims settled by Epstein before and after this malicious lawsuit was filed. Specifically, Edwards intends to rely upon and use the number of claims that Epstein settled in the two years prior to December 7, 2009 and the number of claims that were settled after December 7, 2009 at future hearings and at trial, as this information is highly relevant to Epstein's motive in filing this malicious and unfounded lawsuit against Edwards.

5. It has been Edwards' contention from the very beginning that one of Epstein's primary motives in filing this lawsuit was to intimidate his child victims into cheaply compromising or abandoning their sexual molestation claims against Epstein. The number of claims that had already been settled prior to this malicious lawsuit is highly relevant to this motive as it demonstrates the predicament that Epstein faced immediately before filing this malicious lawsuit against Edwards. Epstein had already settled a considerable number of claims and he knew that many more victims were still out there. He was angry, and he sought to go on the offensive against the remaining child victims in order to intimidate and silence them. Epstein quite clearly


did not want to repeat the settlement history that pre-dated this maliciously filed lawsuit. He needed to change the narrative.

6. The number of sexual misconduct claims that were settled after the filing of this malicious lawsuit is relevant to demonstrate the significant financial exposure that Epstein faced on December 7, 2009, which he attempted to reduce by suing an attorney representing some of his victims (Edwards) as well as one of the victims herself (L.M.). The Court has already ruled that the number of claims Epstein faced at the time he filed and continued this malicious lawsuit is admissible. See Order on Plaintiff/Counter-Defendant Jeffrey Epstein's Revised Omnibus Motion in Limine Section D (References to Cases Not Litigated by Edwards), entered on January 16, 2018. Edwards is nonetheless including this request to lift any confidentiality that may exist as to the settled claims the post-date the filing of this malicious lawsuit, in an abundance of caution. See Ex. 'A'.

WHEREFORE, Counter-Plaintiff, Bradley J. Edwards, respectfully requests that the Court enter an Order granting this Motion to Lift Confidentiality Designation of Epstein's Disclosure of Confidential Settlement Information, as well as awarding any such further relief as the Court deems just and proper given the circumstances.

Edwards adv. Epstein
Motion to Lift Confidentiality Designation
Case No.: 502009CA040800XXXXMBAG

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 26th day of January, 2018.



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Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

ORDER COMPELLING EPSTEIN TO PRODUCE SETTLEMENT AMOUNTS

THIS CAUSE came before the Court upon Counter-Plaintiff's *ore tenus* motion on December 7, 2017. The Court, having heard argument of counsel does hereby,

ORDER AND ADJUDGE that:

1. Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") shall produce to Defendant/Counter-Plaintiff Bradley J. Edwards ("Edwards") the following:
 - a. The number of claims settled by Jeffrey Epstein regarding individuals who alleged to be victims of sexual misconduct by Epstein, from December 6, 2007 to December 6, 2009;
 - b. The gross settlement amount paid by Epstein to individuals who alleged to be victims of sexual misconduct by Epstein, from December 6, 2007 to December 6, 2009;
 - c. The number of claims settled by Jeffrey Epstein regarding individuals who alleged to be victims of sexual misconduct by Epstein, from December 7, 2009 through the present; and

'The court has reviewed the hearing transcript and the competing Orders and finds that this Order captures more accurately the intent of the court as it relates to the Court's oral rulings at the subject hearing. @

Ex. A

d. The gross settlement amount paid by Epstein to individuals who alleged to be victims of sexual misconduct by Epstein, from December 7, 2009 through the present.

2. The number of claims and amounts shall be produced as “Confidential, for Attorneys’ and Clients’ Eyes Only,” and shall not, directly or indirectly, be disclosed to anyone else or used outside of this litigation.

3. If a party intends to quote, disclose, rely on or use in this litigation information or documents that have been deemed “Confidential, for Attorneys’ and Clients’ Eyes Only,” whether in papers filed with the Court or verbally, in connection with a motion, hearing, deposition or trial, before any such information is quoted, disclosed, relied upon or used, the party must file a Motion to have the information or documents deemed to be no longer confidential, must file the information or documents under seal in accordance with Administrative Order 2.303-9/09 and have the proposed quote, disclosure, reliance or use of such information or documents heard and approved by the Court.

4. The Court defers rulings on the admissibility of the number of claims and the gross settlement amounts disclosed pursuant to this Order and the admissibility of the combined settlement amounts of Edwards’ three clients for whom Edwards was prosecuting civil cases against Epstein at the time Epstein filed the December 7, 2009 lawsuit against Edwards. No production of the underlying Settlement Agreements with each of Edwards’ three clients or with any other alleged victim is required by this Order. The Court defers ruling on whether there will be any further disclosure of any breakdown of the settlement amounts paid by Epstein.

5. Epstein shall file a new Motion addressing separately the admissibility of the aggregate settlement amount paid to Edwards’ three clients and the gross settlement amounts

disclosed pursuant to this Order. The Motion should also address Epstein's position as to the production of any Settlement Agreements underlying any settlements paid by Epstein and outline the confidentiality provisions governing those agreements. To the extent that disclosure of any such provisions is subject to confidentiality, disclosure shall be made under seal in accordance with Administrative Order 2.303-9/09.

6. The parties shall schedule a 30-minute hearing on Epstein's Motion. Edwards shall respond to the Motion in accordance with this Court's judicial instructions.

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this 5 day
of Jan, 2019. @

THE HONORABLE DONALD W. HAFELE
CIRCUIT COURT JUDGE

SERVICE LIST

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