

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).

MOTION TO RECONFIRM EXISTING PRETRIAL DEADLINES

Bradley Edwards, through his undersigned attorneys, moves this Honorable Court to reconfirm all existing pretrial deadlines as established by prior Court order and in support of this motion would show:

Defendant Epstein moved to continue the special set trial of this matter on a variety of grounds. The Court expressly rejected all grounds raised by Epstein but reserved ruling on the motion for continuance based solely on the need for the Court to determine whether additional time was necessary for the Court to resolve pending legal issues. The Court subsequently determined there was a need to continue the trial again citing as the sole basis for continuing the trial the need to resolve pending legal issues in advance of trial. The order resetting the trial did not alter any pretrial deadlines including the discovery cutoff date. Nevertheless, Epstein has taken the position that none of the existing deadlines continue to impose any obligation on the parties,

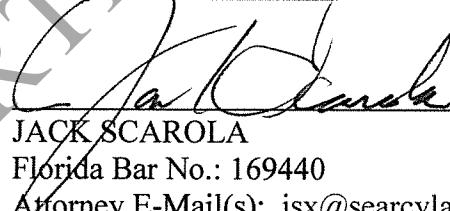
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specifically including but not limited to the obligation to complete discovery by the previously imposed discovery cutoff date.

Given Epstein's well-established pattern of unreasonable delay in this and every other case he has defended, the Plaintiff objects to any effort to expand existing deadlines and thereby create new opportunities to generate excuses for even more delays. This pattern of procrastination and delay is clearly illustrated by the history of discovery chronicled in the attached Exhibit A.

Accordingly, Bradley Edwards requests entry of an order confirming that all previously established deadlines continue to apply.

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 15th day of Nov., 2017.



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EXHIBIT A
HISTORY OF EPSTEIN'S DEPOSITION CONDUCT

DATE OF NOTICE	WITNESS(ES)	DATE DEPO SCHEDULED	TAKEN
4/5/10	Scott Rothstein (c/o Marc S. Murkin, Esq.)	4/15/10	
4/6/10	Michael Fisten & Richard Fandry	4/19/10	
4/16/10	Herbert Stettin, Trustee in Bankruptcy for Rothstein Rosenfeldt Adler, PA	5/19/10	Cancelled 1/19/11
12/6/10	Gary Farmer (corrected) (Apparently misdated and should be 1/6/11)	1/26/11	Cancelled 1/24/11
12/16/10	Mike Fisten	1/19/11	
12/16/10	Russell Adler	1/20/11	Cancelled 1/19/11
12/16/10	Ken Jenne	1/25/11	Cancelled 1/21/11
12/16/10	Scott Rothstein	1/21/11	
12/16/10	Gary Farmer	1/26/11	Cancelled 1/24/11
12/16/10	Debra Villegas	1/27/11	Cancelled 1/24/11
12/16/10	A.J. Discala	1/28/11	YES (on 5/25/11)
12/16/10	Thane Richie	1/31/11	Cancelled 1/28/11
12/16/10	Michael Legamaro	2/1/11	Cancelled
12/16/10	Dean Kretschmar	2/4/11	YES (on 2/11/11)
1/4/11	Herbert Stettin, Trustee for Bankruptcy for RRA	1/20/11	Cancelled 1/19/11
1/6/11	Mike Fisten (corrected)	1/19/11	
1/6/11	Russell Adler (corrected)	1/20/11	Cancelled 1/19/11
1/6/11	Herbert Stettin, Trustee in Bankruptcy for RRA	1/20/11	Cancelled
1/6/11	Scott Rothstein (corrected)	1/21/11	YES 6/14/12
1/6/11	Ken Jenne (corrected)	1/25/11	Cancelled 1/21/11
1/6/11	Debra Villegas (corrected)	1/27/11	Cancelled 1/24/11
1/11/11	Dean Kretschmar (Re-Notice)	2/11/11	YES
1/19/11	Cancellation of Russell Adler	1/20/11	Cancelled
1/19/11	Cancellation of Herb Stettin		Cancelled

1/21/11	Cancellation of Ken Jenne	1/25/11	Cancelled
1/24/11	Cancellation of Debra Villegas	1/27/11	Cancelled
1/24/11	Cancellation of Gary Farmer	1/26/11	Cancelled
1/28/11	Cancellation of Michael Legamaro	2/1/11	Cancelled
1/28/11	Cancellation of Thane Ritchie	1/31/11	Cancelled
2/2/11	A.J. Discala	2/22/11	YES (on 5/25/11)
2/8/11	Thane Ritchie	2/22/11	Cancelled
2/23/11	A.J. Discala (Re-Notice)	2/23/11	YES (on 5/25/11)
2/23/11	Michael Legamaro	3/11/11	YES
3/4/11	R/C Herbert Stettin, Trustee in Bankruptcy for RRA	3/16/11	Cancelled
3/8/11	A.J. Discala (Re-Notice)	3/10/11	YES (on 5/25/11)
4/6/11	Russell Adler	4/20/11	YES
4/7/11	AJ Discala (Re-Notice)	5/12/11	YES (on 5/25/11)
4/13/11	AJ Discala (Re-Notice)	5/25/11	YES
5/16/11	Cara Holmes	6/10/11	Cancelled 6/6/11
6/6/11	Cara Holmes (Re-Notice)	6/21/11	Cancelled
6/6/11	Cancellation of Cara Holmes	6/10/11	Cancelled
10/24/12	Bradley Edwards	11/13/12	YES
4/5/13	Bradley Edwards	5/15/13	YES
4/23/13	Bradley Edwards (Amended)	5/15/13	YES
8/6/13	Bradley Edwards	10/10/13	YES
8/2/17	Attorney Coleman requested deposition dates for 4 witnesses: LM, EW, Jane Dow and Virginia Roberts		
8/2/17	Mr. Edwards' attorney responded with dates available in the first 2 weeks of October and to call to clear specific dates		
8/3/17	Ms. Coleman asked Mr. Edwards to confirm that he would accept service for the 3 clients (LM, EW and Jane Doe)		
8/3/17	Mr. Edwards confirmed that he would accept service		
8/9/17	Mr. Edwards requested that Ms. Coleman specify which dates in early October she chooses to take depositions		

8/9/17	Ms. Coleman selected 7 dates between Oct. 10 and October 19		
8/14/17	Mr. Edwards' counsel provided 3 dates 10/5, 10/11 and 10/12/17		
8/14/17	Ms. Coleman instructed Mr. Edwards counsel to hold 10/5, 10/11 and 10/12/17		
8/16/17	Mr. Edwards confirmed that he would make his clients available on any date		
8/29/17	Courtney Moody	9/12/17	YES
8/29/17	Bradley Edwards	11/10/17	YES
8/31/17	Re-Notice Courtney Moody	10/12/17	YES
10/5/17	Virginia Roberts		NO. Cancelled unilaterally by Epstein's counsel on 9.26.17
10/12/17	EW (in prison)	10/12/17	YES

Epstein's counsel noticed Virginia Roberts for 10/5/17 and EW (in prison) for 10/12. On 9/26/17, they unilaterally cancelled Virginia Roberts' deposition. Epstein's counsel never used 10/11/17 and never set anyone for 10/5/17. The only date they made use of was 10/12/17, the date EW was deposed.

No other depositions were attempted to be set until a request was made on 11/3/17 to depose Dr. James Jansen and a request was made on 11/3/17 to depose 8 attorneys.