

#291874/mep

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,

Defendant.

FILED  
11 APR 25 PM 3:22  
SHARON R. FOSTER, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 4

**PLAINTIFF'S MOTION TO COMPEL AND IMPOSE  
SANCTIONS FOR FAILURE TO APPEAR**

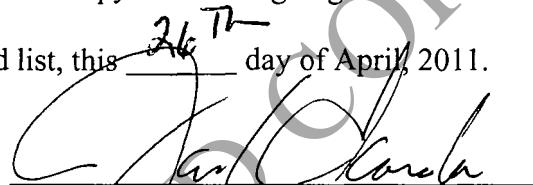
Defendant/Counter-Plaintiff, Bradley J. Edwards, by and through his undersigned counsel, moves this Honorable Court for an order imposing sanctions against the Plaintiff for his failure to appear and compelling the attendance of Plaintiff, Jeffrey Epstein, at deposition, and as grounds therefore would show:

1. The deposition of Jeffrey Epstein was duly noticed at a time convenient for Plaintiff as well as Defendants.
2. Jeffrey Epstein did not appear for the deposition and Edwards' counsel was informed by counsel for Plaintiff that Jeffrey Epstein was notified of the deposition and simply chose not to appear.
3. Defendant/Counter-Plaintiff has been forced to move to compel the appearance of Plaintiff and to travel to Palm Beach County for a hearing of this Motion, and the deposition, and has incurred additional unnecessary time and expenses.

Edwards adv. Epstein  
Case No.: 502009CA040800XXXXMBAG  
Motion to Compel and Impose Sanctions for Failure  
to Appear

WHEREFORE, Plaintiff moves for an order imposing sanctions against the Plaintiff, Jeffrey Epstein, compelling attendance of Jeffrey Epstein for deposition and for an order taxing attorney's fees necessitated by Plaintiff's cavalier attitude toward the litigation.

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 26<sup>th</sup> day of April, 2011.



Jack Scarola  
Florida Bar No.: 169440  
Searcy Denney Scarola Barnhart & Shipley  
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  
Motion to Compel and Impose Sanctions for Failure  
to Appear

**COUNSEL LIST**

Jack A. Goldberger, Esquire  
jgoldberger@agwpa.com;  
smahoney@agwpa.com  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Avenue South, Suite 1400  
West Palm Beach, FL 33401  
Phone: (561)-659-8300  
Fax: (561)-835-8691  
Attorneys for Jeffrey Epstein

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  
Attorneys for Jeffrey Epstein

Joseph L. Ackerman, Jr., Esquire  
jla@fowler-white.com  
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  
Attorneys for Jeffrey Epstein

Marc S. Nurik  
marc@nuriklaw.com  
Law Offices of Marc S. Nurik  
One E Broward Blvd., Suite 700  
Fort Lauderdale, FL 33301  
Phone: (954)-745-5849  
Fax: (954)-745-3556  
Attorneys for Scott Rothstein

Martin Weinberg, Esquire  
Martin Weinberg, P.C.  
20 Park Plaza, Suite 1000  
Suffolk, MA 02116  
Phone:  
Fax:  
Attorneys for Jeffrey Epstein

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FIFTEENTH JUDICIAL CIRCUIT IN  
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JEFFREY EPSTEIN,

Plaintiff,

vs.

No. 502009CA040800XXXXMBAG

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

Defendants.

CERTIFICATE OF NON-APPEARANCE

**DEPOSITION OF:** JEFFREY EPSTEIN  
**DATE:** APRIL 13, 2011  
**TIME:** 9:30 a.m.  
**PLACE:** SEARCY, DENNEY, SCAROLA,  
BARNHART & SHIPLEY, P.A.  
2139 Palm Beach Lakes Boulevard  
West Palm Beach, Florida

STATE OF FLORIDA )  
 ) ss.  
COUNTY OF BROWARD )

I, CHRISTINE PHIPPS, RPR, FPR, CLR, do  
hereby certify that I was present for the purpose  
of reporting this deposition and that the  
deponent did not appear.

Under penalties of perjury, I declare  
that I have read the foregoing certificate and  
that the facts stated in it are true.

*Christine Phipps*  
\_\_\_\_\_  
Christine Phipps, RPR, FPR, CLR,  
Phipps Reporting, Inc.  
8517 Legend Club Drive  
West Palm Beach, Florida 33412

<b>A</b>	<b>Florida</b> 1:6,31 1:34,51 <b>foregoing</b> 1:43 <b>FPR</b> 1:38,48	<b>SEARCY</b> 1:28 <b>SHIPLEY</b> 1:29 ss 1:35 <b>STATE</b> 1:34 stated 1:44		
<b>B</b>	<b>I</b>	<b>T</b>		
<b>BARNHART</b> 1:29 <b>Beach</b> 1:6,30,31 1:51 <b>Boulevard</b> 1:30 <b>BRADLEY</b> 1:15 <b>BROWARD</b> 1:36	<b>individually</b> 1:14,16,17	<b>TIME</b> 1:27 true 1:44		
<b>C</b>	<b>J</b>	<b>V</b>		
<b>certificate</b> 1:23 1:43 <b>certify</b> 1:39 <b>Christine</b> 1:38 1:48 <b>CIRCUIT</b> 1:4,5 <b>CLR</b> 1:38,48 <b>Club</b> 1:50 <b>COUNTY</b> 1:6 1:36 <b>COURT</b> 1:4	<b>J</b> 1:15 <b>JEFFREY</b> 1:9 1:25 <b>JUDICIAL</b> 1:5	vs 1:12		
	<b>L</b>	<b>W</b>		
<b>certificate</b> 1:23 1:43 <b>certify</b> 1:39 <b>Christine</b> 1:38 1:48 <b>CIRCUIT</b> 1:4,5 <b>CLR</b> 1:38,48 <b>Club</b> 1:50 <b>COUNTY</b> 1:6 1:36 <b>COURT</b> 1:4	<b>Lakes</b> 1:30 <b>Legend</b> 1:50 <b>L.M</b> 1:16	<b>West</b> 1:31,51		
<b>D</b>	<b>N</b>	<b>1</b>		
<b>DATE</b> 1:26 declare 1:42 <b>Defendants</b> 1:19 <b>DENNEY</b> 1:28 deponent 1:41 deposition 1:25 1:40 <b>Drive</b> 1:50	<b>NON-APPEA...</b> 1:23	13 1:26		
<b>E</b>	<b>P</b>	<b>2</b>		
<b>EDWARDS</b> 1:15 <b>EPSTEIN</b> 1:9 1:25	<b>Palm</b> 1:6,30,31 1:51 penalties 1:42 perjury 1:42 <b>Phipps</b> 1:38,48 1:49 <b>PLACE</b> 1:28 <b>Plaintiff</b> 1:11 present 1:39 purpose 1:39 <b>P.A</b> 1:29	2011 1:26 2139 1:30		
<b>F</b>	<b>R</b>	<b>3</b>		
<b>facts</b> 1:44 <b>FIFTEENTH</b> 1:5	read 1:43 reporting 1:40 1:49 <b>ROTHSTEIN</b> 1:14 <b>RPR</b> 1:38,48	33412 1:51		
	<b>S</b>	<b>5</b>		
	<b>SCAROLA</b> 1:28 <b>SCOTT</b> 1:14	502009CA040... 1:12		
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		8517 1:50		
		<b>9</b>		
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