

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

CIRCUIT CIVIL DIVISION AG  
CASE NO. 50-2009-CA-040800-XXXX-MB

JEFFREY EPSTEIN,  
Plaintiff(s)

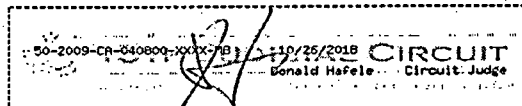
v.

SCOTT ROTHSTEIN, individually,  
BRADLEY J. EDWARDS, individually,  
and L M, individually,  
Defendant(s).

**NOTICE TO COUNSEL OF RECORD**

THE COURT hereby notices counsel of record of the attached request to videotape the upcoming trial in this matter. Please review the attached and file any objection to same within ten (10) days from the date of this order and set objection for an 8:45 uniform motion calendar hearing no later than twenty (20) days from the date of the Objection.

**DONE AND ORDERED** in Chambers, at West Palm Beach, Palm Beach County, Florida, this 26th day of October, 2018.



DONALD HAFELE  
Circuit Judge

**Copies furnished to:**

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- ☒ Bradley James Edwards (brad@epllc.com)
- ☒ Jay C Howell (jay@jayhowell.com)
- ☒ John Scarola (\_scarolateam@searcylaw.com)
- ☒ JOSEPH L ACKERMAN, JR (JACKERMAN@FOWLER-WHITE.COM)

Notice of Filing

Case No. 50-2009-CA-040800-XXXX-MB

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Case No. 50-2009-CA-040800-XXXX-MB

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- ✓ David P. Vitale Jr. (vitaletteam@searcylaw.com)

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## Denise Van Vooren

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**From:** Debra Oats  
**Sent:** Tuesday, October 23, 2018 3:40 PM  
**To:** Denise Van Vooren  
**Subject:** FW: CONVERSATION THIS WEEK RE: DECEMBER 4TH TRIAL (BRADLEY J. EDWARDS V. JEFFREY EPSTEIN)

Hi Denise,

The below request to film your upcoming trial, Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards, Case number 2015-CA-040800, is from an outlet called Radical Media. In reviewing their website, they appear to be a legitimate news/media group.

Please let me know if Judge Hafele approves this request. If approved, the only objection I would make deals with their request for two cameras and to any additional microphones on counsel tables and/or the Bench.

Debra

**From:** Dave Snyder <snyder@radicalmedia.com>  
**Sent:** Friday, October 19, 2018 4:29 PM  
**To:** Debra Oats <DOats@pbcgov.org>  
**Cc:** osborne@radicalmedia.com  
**Subject:** CONVERSATION THIS WEEK RE: DECEMBER 4TH TRIAL (BRADLEY J. EDWARDS V. JEFFREY EPSTEIN)

Dear Ms. Oats,

It was great speaking with you this week - thank you for taking the time to answer all my questions!

As we discussed, director Joe Berlinger and RadicalMedia are requesting that the Palm Beach County Circuit Civil Court grant us video camera access to the upcoming trial of Bradley J. Edwards v. Jeffrey Epstein, scheduled to begin on Tuesday, December 4th, 2018 at 9:30 am.

We understand that this access would mean RadicalMedia is responsible for the trial's pool camera in the event other news organizations want to record the proceedings, and we would fulfill this responsibility, along with providing a distribution box for other media to have access to video and audio recordings, as required by court rules.

We seek to operate the camera on every day of the trial, recording all the gavel to gavel testimony and courtroom activity.

This footage is for a documentary series about Jeffrey Epstein and the people involved in litigation related to him.

The series is to be directed by Oscar nominee and Emmy-winning filmmaker Joe Berlinger, and produced by RadicalMedia.

News reports often just use a few minutes of audio and video from the courtroom to highlight the day's story. In contrast, we will be producing four one-hour episodes that will rely heavily on courtroom footage using key facts and testimony from the trial to tell an in-depth story.

To ensure a smooth operation, we request five seats: two for two camera operators, one for a sound engineer, one for a producer/director and one for an associate producer/production assistant. Please be assured our staff will follow courtroom protocol and procedures in the utmost professional manner and non-invasive way.

A list of our suggested equipment is below.

Please let me know if there is any additional paperwork for us to fill out.

We would be happy to answer any questions or concerns, and would be honored if granted permission by the court.

Some background on us: Joe Berlinger is one of the world's leading documentary filmmakers and a pioneer in the true crime genre, and has won awards and accolades for films such as the *Paradise Lost* trilogy (Academy Award nominee, Emmy and Peabody Award winner), *Brother's Keeper* (Director's Guild of America Award winner), and *Under African Skies* (Emmy Award winner). RadicalMedia's work includes the Oscar-winning documentary, *The Fog of War*, Oscar-nominated and Emmy-winning film, *What Happened, Miss Simone?*, and two series that were nominated for Emmy's in 2018: *My Next Guest Needs No Introduction* with David Letterman, and *The Fourth Estate*.

### **Audiovisual Recording Equipment List**

#### **Inside the Courtroom**

- Camera A: Arri Amira with small external HD monitor and external recorder, plus tripod. Camera dimensions: 12.1"x5.4"x5.8".
- Camera B: Arri Amira with small external HD monitor and external recorder, plus tripod. Camera dimensions: 12.1"x5.4"x5.8".
- Battery charger.
- Microphones.
- Sound Devices 788 recorder.
- Transmitter system with receiver.

#### **Outside the Courtroom**

- X32 mixer.
- Video distribution amplifier.
- Audio box.
- Pix240 recorder.

Thanks so much and hope to hear from you soon.

All the best,

Dave

**Dave Snyder**

Executive Producer/Development, The Joe Berlinger Group

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