

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).

_____ /

REQUEST TO PRODUCE TO JEFFREY EPSTEIN

Bradley J. Edwards by and through his undersigned counsel, requests, pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, that Jeffrey Epstein produce and permit Bradley J. Edwards to inspect and copy each of the following documents*:

Any and all documents* reflecting or relating to any expenditure of time, effort or money by you or on your behalf to influence directly or indirectly your public image or reputation including but not limited to:

1. expenditures directed at overcoming, counter-balancing, or suppressing adverse media attention focused on any criminal charges lodged against you;
2. communications relating to your desire for privacy or confidentiality;

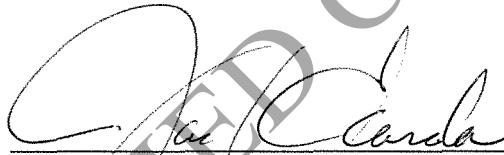
3. communications with any other person expressing a desire to be shielded from adverse public attention arising out of any reputed association with you.

*"Documents" shall include, but not be limited to all non-identical copies of writings, drawings, graphs, charts, photographs, phono-records, recordings, and/or any other data compilations from which information can be obtained, translated, if necessary, by the party to whom the request is directed through detection devices into reasonably usable form. "Documents" also include all electronic data as well as application metadata and system metadata. All inventories and rosters of your information technology (IT) systems—e.g., hardware, software and data, including but not limited to network drawings, lists of computing devices (servers, PCs, laptops, PDAs, cell phones, with data storage and/or transmission features), programs, data maps and security tools and protocols.

It is requested that the aforesaid production be made within thirty days of service of this request at the offices of Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, Florida. Inspection will be made by visual observation, examination and/or copying.

EDWARDS ADV. EPSTIEN
Case No.: 502009CA040800XXXXMBAG
Request to Produce to Defendant,

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 21st day of JANUARY, 2015.



Jack Scarola
Florida Bar No.: 169440
Attorney E-Mail(s): jsx@searcylaw.com and
mep@searcylaw.com
Primary E-Mail: _scarolateam@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorneys for Bradley J. Edwards

COUNSEL LIST

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

William Chester Brewer, Esquire
wcblaw@aol.com
250 S Australian Avenue, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-655-4777
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

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

John R. Beranek, Esquire
jberanek@ausley.com;
csullivan@ausley.com
Ausley & McMullen
123 South Calhoun Street
Tallahassee, FL 32301
Phone: (850)-224-9115
Fax: (850)-222-7560
Attorneys for Jeffrey Epstein

Andrew A. Harris, Esquire
aah@FLAppellateLaw.com;
jew@FLAppellateLaw.com;
Burlington & Rockenbach
444 W Railroad Avenue, Suite 350
West Palm Beach, FL 33401
Phone: (561)-721-0400
Fax: (561)-721-0465
Attorneys for Bradley Edwards

Bradley J. Edwards, Esquire
staff.efile@pathjustice.com
Farmer Jaffe Weissing Edwards Fistos &
Lehrman, P.L.
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Fred Haddad, Esquire
Dee@FredHaddadLaw.com;
Fred@FredHaddadLaw.com
Fred Haddad, P.A.
One Financial Plaza, Suite 2612
Fort Lauderdale, FL 33394
Phone: (954)-467-6767
Fax: (954)-467-3599
Attorneys for Jeffrey Epstein

Tonja Haddad Coleman, Esquire
tonja@tonjahaddad.com;
efiling@tonjahaddad.com
Tonja Haddad, P.A.
315 SE 7th Street, Suite 301
Fort Lauderdale, FL 33301
Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein