

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
MOTION TO ALLOW AMENDMENT TO EXHIBIT LIST**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") respectfully requests that the Court allow him to amend his Exhibit List, and states:

INTRODUCTION

The resetting of this case for trial on Counter-Plaintiff Bradley J. Edwards' ("Edwards") severed Counterclaim will require a new trial order and provides ample time to permit Epstein to amend his Exhibit List and add the exhibits he produced to Edwards on February 2, February 16, and March 2, 2018,¹ which all fell into general categories previously disclosed. Edwards had knowledge of both the exhibits themselves and the content well before Epstein amended his Exhibit List on March 5, 2018 to identify each document individually and, therefore, Edwards cannot claim surprise or prejudice. For instance, the exhibits included documents produced in this

¹Epstein intends to substantially narrow the list of exhibits and will not be adding the "more than 700 exhibits" Edwards complained about.

case, litigation Edwards was directly involved in, and public records, such as police reports and litigation involving Edwards' three clients, among other documents.

RECORD FACTS

1. Pursuant to this Court's July 20, 2017, Order Specially Setting Jury Trial (D.E. 938), the deadline for the exchange of exhibit lists was 60 days prior to trial. At that time, trial was set on December 5, 2017, making the deadline October 6, 2017.

2. The July 20, 2017 Order also provided, in pertinent part:

ADDITIONAL EXHIBITS, WITNESSES OR OBJECTIONS. At trial, the parties shall be strictly limited to exhibits and witnesses disclosed and objections reserved on the schedules attached to the Pre-Trial Stipulation prepared in accordance with paragraphs D and E, *absent agreement specifically stated in the Pre-Trial Stipulation or order of the Court upon good cause shown*. A party desiring to use an exhibit or witness discovered after counsel have conferred pursuant to paragraph D shall immediately furnish the Court and other counsel with a description of the exhibit, together with the reason for the late discovery of the exhibit or witness. Use of the exhibit or witness may be allowed by the Court for good cause shown or to prevent manifest injustice.

(D.E. 938 at ¶ G (emphasis added).)

3. Epstein's current trial counsel were retained after the October 6, 2017 deadline and, on November 6, 2017, in light of the uncertainty of what issues would be tried and the numerous outstanding evidentiary issues, moved for a continuance of the trial and to extend the pre-trial deadlines, including the deadline for allowing the parties to file amended Exhibit Lists. (D.E. 1035.) Edwards *opposed* this request. (D.E. 1055.)

4. On November 14, 2017, the Court granted the continuance request and continued the special set trial to March 13, 2018. The Court's Order, however, did not address Epstein's request for an extension of the pre-trial deadlines. (D.E. 1057.) On November 16, 2017, Epstein amended his Exhibit List. (D.E. 1067.)

5. On November 9, November 15 and December 7, 2017, after the deadline set by the Court's July 20, 2017, Trial Order and without leave of Court, Edwards filed amended Exhibit Lists as well. (D.E. 1043, 1062, 1109.)

6. Counsel sought clarification from the Court on November 27, 2017, regarding the disclosure cutoff ruling. The Court granted Edwards' Motion to Reconfirm the Existing Pre-Trial Deadlines because of his concern over additional discovery. The Court noted, however, that it would permit additional limited discovery upon further motion. (D.E. 1086.)

7. On November 29, December 5 and December 7, 2017, the parties participated in extensive special set hearings wherein the Court made rulings relating to the issues and evidence to be presented at trial.

8. The parties filed their Joint Pretrial Stipulation on December 22, 2017, attaching their last filed Exhibit Lists (Epstein's November 16, 2017, Exhibit List and Edwards' December 7, 2017, Exhibit List). (D.E. 1132.) In the Pretrial Stipulation, the parties agreed that they did not waive their right to amend their Exhibit Lists. *Id.*

9. On December 19, 2017, February 2, 2018, February 16, 2018 and March 2, 2018, Epstein made a rolling production to Edwards of his trial exhibits. Pursuant to the Clerk's pre-marking guidelines (Exhibit A), on March 5, 2018, Epstein served his Clerk's Trial Exhibit List, which identified each of the exhibits individually. (D.E. 1237.) These exhibits were comprised of the following: (a) exhibits already produced in this case; (b) exhibits concerning L.M., E.W. and Jane Doe (the Intervenors/Edwards' three clients); (c) exhibits relating to a defamation lawsuit Edwards filed in 2015 against Alan Dershowitz (one of Epstein's attorneys); (d) printouts from Edwards' current website and verdicts and judgments referenced on the website; (e) Edwards' property records; and (f) documents from the Crime Victims' Rights Act (CVRA) action.

10. At the March 8, 2018, hearing, in response to Edwards' Motion to Strike Untimely Supplemental Exhibits, the Court found that the exhibits Epstein produced on February 2, February 16 and March 2, 2018, were untimely and could not be used at trial. While 47 of the exhibits are the subject of a request for an *in camera* review because of privilege claims asserted by Edwards and the Intervenors, L.M., E.W. and Jane Doe,² the remaining exhibits consist of documents produced in this and the underlying cases and public records.

11. Now that no trial order is yet in place, and because, as fully explained below, Edwards cannot claim surprise by any of the additional exhibits and will not otherwise be prejudiced by Epstein's identification of the subject exhibits, Epstein requests permission to amend his Exhibit List to include a narrowed list of the previously disclosed exhibits and other exhibits Epstein deems appropriate.

ARGUMENT

Epstein respectfully requests an Order granting him permission to amend his Exhibit List and to revisit the Court's earlier ruling that the exhibits were untimely and cannot be used at trial.³ The documents Epstein seeks to add are relevant, do not include any of the documents Edwards claims are privileged⁴, cannot come as any "surprise" to Edwards and will not prejudice Edwards in light of the timing of their disclosure.

² In light of the pending request for an *in camera* review, the request for relief set forth in this Motion does not pertain to those 47 exhibits.

³To date, the Court's rulings on that Motion have not been memorialized in a written order.

⁴Epstein has filed a Motion for an *in camera* review of the 47 exhibits. (D.E. 1319, 1320.)

I. Amendment of Exhibit Lists is Timely Under the Circumstances and is Allowed Pursuant to the Parties' Joint Pretrial Stipulation.

There is no trial order in place. However, amendments to the parties' Exhibit Lists are permissible pursuant to the Court's July 20, 2017 Trial Order, and the parties' December 22, 2017 Joint Pretrial Stipulation. The July 20, 2017 Order provided in pertinent part:

ADDITIONAL EXHIBITS, WITNESSES OR OBJECTIONS. At trial, the parties shall be strictly limited to exhibits and witnesses disclosed and objections reserved on the schedules attached to the Pre-Trial Stipulation prepared in accordance with paragraphs D and E, *absent agreement specifically stated in the Pre-Trial Stipulation or order of the Court upon good cause shown. . .*

(D.E. 938 at ¶ G (emphasis added).)

In addition, in their December 22, 2017, Pretrial Stipulation, the parties expressly agreed that they "do not waive their right to amend their Exhibit Lists and to identify additional objections for those exhibits that have not yet been disclosed and/or provided to correspond with the parties' respective Exhibit Lists." (D.E. 1132 at p. 12) (emphasis added).

Thus, an amendment should be allowed based on the Pretrial Stipulation alone. In fact, it would be an abuse of discretion for the Court to decline the requested amendment. *See City of Opa Loca v. Williams*, 910 So. 2d 865 (Fla. 1st DCA 2005) (because the parties' pre-trial stipulation allowed for amendments to the stipulation to list exhibits and witnesses, the JCC abused his discretion in denying the motion to amend). *See also Palm Beach Polo Holdings, Inc. v. Broward Marine, Inc.*, 174 So. 3d 1037, 1039 (Fla. 4th DCA 2015) (citation and internal quotation marks omitted) ("The Pretrial Stipulation is a powerful blueprint that fully enables a well-run and fair trial. It is the policy of the law to encourage and uphold stipulations in order to minimize litigation and expedite the resolution of disputes.").

II. The Scope and Focus of the Trial was Established in December 2017.

At the November 27, December 5 and December 7, 2017, hearings the Court established the scope and focus of the trial. Specifically, the Court made evidentiary rulings of the type of evidence that would be allowed at trial and made findings about the extent to which Edwards would be able to present evidence about his three clients' cases. Those rulings required Epstein's trial team to reevaluate their trial strategy and the supporting evidence, which resulted in an amended Exhibit List. Now that the Fourth District Court of Appeal has upheld this Court's Order severing the claims, Epstein will again need to re-evaluate his trial strategy and supporting evidence.

III. Edwards Will Not Otherwise be Prejudiced by the Amendment.

“While a trial judge has broad discretion in determining whether to . . . permit introduction of an exhibit not disclosed pursuant to a pretrial order, . . . the trial judge’s discretion should be guided primarily by whether the ‘objecting party’ would be prejudiced by the admission of the evidence.” *Tomlinson-McKenzie v. Prince*, 718 So. 2d 394, 396 (Fla. 4th DCA 1998) (citing *Binger v. King Pest Control*, 401 So. 2d 1310, 1313, 1314 (Fla. 1981)). *Accord Gaspar’s Passage, LLC v. RaceTrac Petroleum, Inc.*, No. 2D17-55, 2018 WL 1613745, at *8 (Fla. 2d DCA Apr. 4, 2018) (“The trial court also abused its discretion by denying Gaspar’s motion to amend its exhibit list in August 2016, several weeks before trial. The intended exhibits became relevant as a result of the amended pleadings, but again, the trial court failed to conduct the required prejudice analysis before denying the motion.”).

As the Fourth District explained in *Tomlinson-McKenzie*:

The objecting party is prejudiced by the admission of such evidence if the party might have taken some action to protect itself had it had timely notice of the witness or exhibit, and there exists no other

alternatives to alleviate the prejudice. The supreme court, in *Binger*, stated that

Prejudice in this sense refers to the surprise in fact of the objecting party, and it is not dependent on the adverse nature of the testimony. Other factors which may enter into the trial court's exercise of discretion are: (i) the objecting party's ability to cure the prejudice or, . . . [its] independent knowledge of the existence of the witness; (ii) the calling party's possible intentional, or bad faith, noncompliance with the pretrial order; and (iii) the possible disruption of the orderly and efficient trial of the case (or other cases).

Id. (quoting *Binger*, 401 So. 2d at 1314). In *Tomlinson-McKenzie*, the appellate court found that “appellees could not have been prejudiced by the introduction of the surveillance tape [at trial] in the sense that:

‘prejudice . . . refers to the surprise in fact of the objecting party’ because the motion to amend the witness and exhibit list was filed several months prior to the actual trial date. In addition, the other factors set out in *Binger* militate strongly toward admission of the surveillance tape. There was no finding that appellants failed to comply with the pretrial order in bad faith. The record reflects that appellants moved to amend the witness and exhibit list as soon as the surveillance tape became available. Further, an objecting party may not, having closed its eyes to the existence of evidence prior to trial, claim that the admission of that evidence would disrupt the orderly and efficient trial of the case.

718 So. 2d at 396.

Similarly, here, Edwards cannot be prejudiced by the introduction of the subject exhibits because this Motion to Amend his Exhibit List is being filed before the actual trial date has even been reset. *See id.* “In addition, the other factors set out in *Binger* militate strongly toward admission of the [subject exhibits].” *Id.* “There was no finding that appellants failed to comply with the pretrial order in bad faith.” *Id.* Epstein’s current counsel had not been retained when the Court entered its July 20, 2017, Order Specially Setting Jury Trial. Nevertheless, both Epstein and Edwards filed Exhibit Lists after the deadline set forth in that Order. The request to amend is not

made in bad faith but, rather, necessitated by the change in the scope and focus of the trial as determined by this Court in December 2017. Epstein's new counsel took steps in good faith after that hearing to reevaluate all evidence compiled to determine how to best defend Epstein's case and determined an amendment to Epstein's Exhibit List was warranted. "Further, [Edwards] may not, having closed [his] eyes to the existence of evidence prior to trial, claim that the admission of that evidence would disrupt the orderly and efficient trial of the case." *Id.*

IV. The Exhibits are Relevant.

Epstein seeks to amend his Exhibit List to be allowed to add documents that are relevant to this litigation to include both a substantially modified list of those items identified on his March 5, 2018, Clerk's Trial Exhibit List (*not* including the 47 documents that Edwards claims are privileged and are currently subject to a request for an *in camera* review)⁵ and any other documents Epstein may determine are relevant.

A. Exhibits from the Production in this Case.

On his November 16, 2017, Exhibit List, Epstein identified at No. 13, "All documents produced by any party or non-party in this matter." Epstein made a rolling production of those exhibits on December 19, 2017, and March 2, 2018, which included: (1) documents produced by Edwards; (2) documents produced by Wackenhut Security; (3) documents produced by Michael Legamaro (a non-party RRA investor); and (4) documents produced by other third parties. On his March 5, 2018, Clerk's Trial Exhibit List, Epstein identified each of the documents produced under this general category individually. Because the subject documents were already produced in this case, and Epstein produced them to Edwards again in December 2017 and March 2018 as "trial

⁵Should the Court find that the 47 documents are not privileged, Epstein will amend his Exhibit List to add those exhibits as well.

exhibits,” Edwards could not be surprised or prejudiced by the introduction of these items at trial — a trial which has yet to be reset.

B. Exhibits Relating to L.M., E.W., and Jane Doe.

On his November 16, 2017, Exhibit List, Epstein identified at No. 323, “All public records and news articles relating to … any witnesses listed by either party.” During the November 29, December 5 and December 7, 2017, hearings, the Court advised the parties that Epstein would essentially need to prove each allegation of his original Complaint, including the allegation that Edwards’ three clients’ (L.M., E.W. and Jane Doe) claims against Epstein were “weak.” The Court also indicated it would allow Edwards to discuss his three clients’ claims against Epstein and Edwards advised that his three clients would testify at trial.

Because of these rulings, Epstein’s counsel shifted their focus from defending probable cause to providing additional evidence to support the fact that Edwards’ clients’ claims were weak at the time Epstein filed the original proceeding. In light of the Court’s rulings that L.M., E.W. and Jane Doe could testify in this malicious prosecution action, Epstein’s counsel re-inventoried the information obtained from extensive background research on each of Edwards’ clients in the underlying cases and conducted additional background research on them in preparation for cross-examining these witnesses as to the weakness of their respective cases and their credibility. This was a large undertaking because Edwards’ three clients have extensive criminal histories relating to incidents throughout the state. Epstein made a rolling production of these documents to Edwards on February 2, February 16 and March 2, 2018, and then listed them individually on his March 5, 2018, Clerk’s Trial Exhibit List.

The documents directly relate to Edwards’ witnesses’ credibility, trustworthiness and background. L.M. and E.W. have both been arrested for prostitution. L.M. admitted to law

enforcement that she was involved in prostitution because her mother was a prostitute. All three clients have been arrested for shoplifting, have drug problems and have admitted to lying. In fact, during her deposition in her lawsuit against Epstein, L.M. provided testimony that contradicted a sworn statement she gave to the FBI and then admitted that she *lied to the FBI* in that statement. L.M. clearly perjured herself and Epstein should be entitled to use documents to challenge her credibility at trial.

Because Edwards represents L.M., E.W. and Jane Doe and is fully aware of evidence of their pasts already provided in the underlying civil cases, none of this information can or does come as a surprise to him. As such, Edwards should not be permitted to hide behind the purportedly “late” disclosure of the documents and the Court should allow Epstein to amend his Exhibit List to identify these exhibits. The majority of the “more than 700 newly identified exhibits” that Edwards complained about relate to this category. Epstein plans to review the documents already produced and substantially narrow the number of exhibits disclosed in this category to the extent that the Court’s ruling to exclude them was based on the large number of newly identified exhibits.

C. Alan Dershowitz.

On his March 5, 2018, Clerk’s Trial Exhibit List, Epstein identified exhibits relating to a defamation lawsuit Edwards filed in January 2015 against Alan Dershowitz (one of Epstein’s attorneys).⁶ Those documents were produced to Edwards under Epstein’s Exhibit No. 323 (public records of any witness) in February 2018.

In the *Dershowitz* action, Edwards alleged:

⁶*Bradley J. Edwards and Paul G. Cassell v. Alan Dershowitz*, 17th Judicial Circuit, Broward County Case No. CACE-15-000072.

Despite having previously been the victim of character assassination by the Defendant ALAN M. DERSHOWITZ'S associate and client, Jeffrey Epstein, BRADLEY J. EDWARDS enjoys a highly favorable national reputation particularly related to his work in defending the rights of child victims of sexual abuse.

(*Dershowitz*, Complaint, ¶ 8, emphasis added.)

Edwards alleged that Dershowitz made a media assault upon him (and Paul G. Cassell) to attack his reputation and character:

... DERSHOWITZ initiated a massive public media assault on the reputation and character of BRADLEY J. EDWARDS and PAUL G. CASSEL accusing them of intentionally lying in their filing, of having leveled knowingly false accusations against the Defendant DERSHOWITZ, without ever conducting any investigation of the creditability of the accusations, and of having acted unethically to the extent that their willful misconduct warranted and required disbarment.

(*Dershowitz*, Complaint, ¶ 17.)

In April 2016, Edwards, Cassell and Dershowitz resolved their respective claims and Edwards and Cassell informed the Court that the filing of their action against Dershowitz was a “tactical mistake.” (*Dershowitz*, Notice of Withdrawal of Motion for Partial Summary Judgment.)

In order to maximize his recovery on his claims against Dershowitz, Edwards had to and did allege that his reputation had recovered (from any effects of Epstein’s suit against him) and that Dershowitz’ defamatory public statements were the sole source of harm to his reputation. Now that Edwards has admitted that suing Dershowitz was a tactical mistake, and can obtain no further financial gain from claiming that Dershowitz is responsible for the harm to Edwards’ reputation, Edwards once again claims that Epstein is the sole cause of harm to his reputation. Epstein, therefore, identified exhibits from the *Dershowitz* defamation lawsuit that contradict this position. Because Edwards was a party to the *Dershowitz* lawsuit, the documents are no surprise to Edwards. In fact, it was Edwards who made those allegations in that lawsuit, and he cannot and

will not be prejudiced by allowing relevant exhibits from that lawsuit to be identified now. Accordingly, Epstein asks the Court to allow him to amend his Exhibit List to identify exhibits relating to the *Edwards v. Dershowitz* litigation.

D. Edwards' Website and Verdicts.

On his March 5, 2018, Clerk's Trial Exhibit List, Epstein identified printouts from Edwards' current website and verdicts and judgments referenced on the website. These documents, too, were produced to Edwards under Epstein's Exhibit No. 323 (public records of any witness) in February 2018. On his website, Edwards touts his jury verdicts, including verdicts he has received since Epstein filed suit (\$7.1 million, \$5.7 million, \$24 million, etc.). It is important for the jury to understand and see how Edwards has not "suffered" from Epstein's filing of the lawsuit against him. Like the other exhibits, these documents are no surprise to Edwards as they come directly from his website or relate to litigation he was directly involved in. Accordingly, this Court should permit Epstein to amend his Exhibit List now to identify those documents.

E. Edwards' Property Records.

Other public records Epstein produced to Edwards in February 2018 as part of his Exhibit No. 323 (public records of any witness) included Edwards' real property ownership records. Epstein identified these specifically on his March 5, 2018, Clerk's Trial Exhibit List. The documents will show the jury how Edwards' success after Epstein filed suit has allowed him to invest in more expensive and larger real estate. These documents are public records which directly involve Edwards and transactions of which he has direct knowledge. Edwards therefore cannot claim surprise and Epstein should be allowed to amend his Exhibit List to identify these documents. *See Gaspar's Passage, LLC*, No. 2D17-55, 2018 WL 1613745, at *8 ("[I]f, as Gaspar's counsel alleged, some of the exhibits were public record, RaceTrac would have difficulty

establishing prejudice. Indeed, the transcript reflects that RaceTrac was aware of at least the property appraiser records—which are public record—because its expert had relied on a report that incorporated those records) (citing *Tomlinson-McKenzie*, 718 So. 2d at 396 (“[A]n objecting party may not, having closed its eyes to the existence of evidence prior to trial, claim that the admission of that evidence would disrupt the orderly and efficient trial of the case.”)).

F. CVRA Documents.

Edwards has taken the position that his involvement in the Crime Victims’ Rights Act action against the United States Government was a motive for Epstein to file suit against him. Because Edwards has made it clear that he intends for that action to play a significant role in his presentation of his case, Epstein produced to Edwards select documents from that action in December 2017, February 2018 and March 2018 that he intended to use as trial exhibits and then individually identified the documents on his March 5, 2018, Clerk’s Trial Exhibit List.

Contrary to Edwards’ position, he was *not* pursuing the CVRA action at the time Epstein filed this litigation. Rather, in August 2008, Edwards informed the Federal Court that it was not in his clients’ best interest to pursue that action. In February 2009, the Federal Court denied Edwards’ clients’ Motion to Unseal the Non-Prosecution Agreement. Other than putting the Court on notice of his change of firm, Edwards did *nothing* in the case during his tenure at Rothstein, Rosenfeld & Adler (RRA). In fact, he did *nothing* until September 13, 2010 – almost a year after RRA imploded and Epstein filed this litigation.

Epstein should be allowed to present evidence to the jury to show that Edwards was, in fact, *not* pursuing the CVRA action, the Government’s defenses and Epstein’s limited involvement in that action. Edwards himself identified the *entire* action on his Exhibit List. (Edwards’ Trial Exhibit No. 113.) While he has produced certain documents from that action, he has *not* listed

them individually as required by the Clerk's guidelines. Epstein, therefore, should be allowed to amend his Exhibit List to identify documents from the CVRA action.

CONCLUSION

"Although a judge has broad discretion in determining whether to exclude evidence due to a party's failure to disclose the evidence within the time required by a pretrial order, the exclusion of such evidence is a drastic remedy which should pertain in only the most compelling circumstances and only after the judge has made a case-specific determination as to whether admission of the evidence would result in actual procedural prejudice to the objecting party." *Med. Logistics, Inc. v. Marchines*, 911 So. 2d 823, 824 (Fla. 1st DCA 2005) (citing *Binger*). According to *Binger*, any prejudice of late-disclosed exhibits must be caused by "surprise in fact." 401 So. 2d at 1314. As set forth above, the subject documents were produced to Edwards as trial exhibits in February and March 2018 and are documents Edwards already had in his possession, or of which Edwards was already aware through litigation in his underlying client cases against Epstein or his own defamation lawsuit against Dershowitz, or because of their public nature. Furthermore, the documents go to the very heart of Epstein's defense—that Edwards cannot establish that Epstein did not have probable cause to file suit against Edwards, that Edwards' clients' cases were weak, and that Edwards has no damages. *See Tomlinson-McKenzie*, 718 So. 2d at 396 ("The surveillance tape of Ms. Prince sitting in a car for extended periods of time and sitting on bleachers at her son's soccer matches goes to the very heart of this case—the extent of her injuries. The surveillance tape provides a direct challenge to Ms. Prince's assertions that the injuries sustained in the accident diminished her capacity to earn a living because she could not sit for extended periods of time as required by her job. Under the circumstances, the trial judge's omission of the surveillance tape was not harmless error.").

Accordingly, Epstein respectfully requests that the Court grant this Motion and allow him to amend his Exhibit List as set forth herein.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on April 27, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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EXHIBIT A

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Exhibit Requirements:

All exhibits that will be entered into evidence must be pre-marked using the [Civil Exhibit Card Template](#) and affixed to the back of the exhibit.

All exhibits must be marked for ID on the exhibit card.

Numbers and letters only: No symbols

Exhibit #s: No more than 10 characters including spaces

The exhibits list must be numbered sequentially.

Large demonstrative poster boards or items to be used in court for evidence must be accompanied by a smaller version for submissions to the Clerk. Exhibits must be stapled, bound or fastened together with an ACCO type fastener (two-pronged locking paper compressor).

NO NOTEBOOK BINDERS

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When a party would like the court to take judicial notice of any document or pleading; or

When the document or pleading is published to the jury.

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Make copies of the card for each exhibit; or

Use Avery labels 5163 which can then be adhered to the BACK of the page. (Template can be scanned onto Avery Labels).

The exhibit card must be filled out completely and legibly.

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Tape the card to the BACK of each exhibit (no clips).

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