

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 OCT 28 PM 3:42  
SHARON R. BOCK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT CIVIL 4

**ANSWER AND AFFIRMATIVE DEFENSES TO  
SECOND AMENDED COMPLAINT**

Defendant, BRADLEY J. EDWARDS (EDWARDS), responds to Plaintiff's Introduction by stating that it is irrelevant surplusage requiring no answer.

**GENERAL ALLEGATIONS**

1. Defendant, EDWARDS, denies the allegations contained in paragraph 1 and demands strict proof thereof.
2. Admitted.
3. Admitted.
4. Admitted.
5. Defendant, EDWARDS, denies the allegations contained in paragraph 5 and demands strict proof thereof.
6. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 6 so therefore denies same and demands strict proof thereof.

7. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 7 so therefore denies same and demands strict proof thereof.

8. Defendant, EDWARDS, admits that RRA was engaged in litigation against Epstein in three civil cases, but Defendant, EDWARDS, is without knowledge to either admit or deny the balance of the allegations of paragraph 8 so therefore denies same and demands strict proof thereof.

9. Admitted.

10. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 10 so therefore denies same and demands strict proof thereof.

11. Defendant, EDWARDS, admits that Fisten and Jenne provided investigative services relating to the prosecution of the Epstein Actions. Defendant, EDWARDS, denied the balance of the allegations of paragraph 11 and demands strict proof thereof.

12. Defendant, EDWARDS, admits that Fisten and Jenne reported to Edwards regarding matters related to the Epstein Actions. Defendant, EDWARDS, is without knowledge as to the balance of the allegations of paragraph 12 so therefore denies same and demands strict proof thereof.

13. Admitted.

14. Defendant, EDWARDS, admits that Edwards incurred costs in the prosecution of the Epstein Actions. Defendant, EDWARDS, is without knowledge as to the balance of the allegations of paragraph 14 so therefore denies same and demands strict proof thereof.

15. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 15 so therefore denies same and demands strict proof thereof.

16. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 16 so therefore denies same and demands strict proof thereof.

17. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 17 so therefore denies same and demands strict proof thereof.

18. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 18 so therefore denies same and demands strict proof thereof.

19. Defendant, EDWARDS, has accurately testified regarding the prosecution of the Epstein Actions and all conflicting allegations are denied and defendant demands strict proof thereof.

20. Defendant, EDWARDS, has accurately testified regarding the prosecution of the Epstein Actions and all conflicting allegations are denied and defendant demands strict proof thereof.

21. Admitted.

22. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 22 so therefore denies same and demands strict proof thereof.

23. Admitted.

24. Defendant, EDWARDS, admits the allegations contained in subparts (e) and (f) of paragraph 24. Defendant, EDWARDS, denies the balance of the allegations contained in paragraph 2 and demands strict proof thereof.

25. Defendant, EDWARDS, denies the allegations contained in paragraph 25 and demands strict proof thereof.

26. Defendant, EDWARDS, is without knowledge to either admit or deny the allegations contained in paragraph 26 so therefore denies same and demands strict proof thereof.

27. Admitted.

28. Defendant, EDWARDS, admits that Rothstein was arrested, arraigned in federal court, pled guilty and ultimately was sentenced to a 50 year prison sentence for fraud and racketeering. Defendant, EDWARDS, is without knowledge as to the balance of the allegations contained in paragraph 29 so therefore denies same and demands strict proof thereof.

COUNT I: ABUSE OF PROCESS—EDWARDS

29. Defendant, EDWARDS, admits or denies each of the allegations contained in paragraphs 1 through 28 as if fully set forth here.

30. Defendant, EDWARDS, denies the allegations contained in paragraph 30 and demands strict proof thereof.

31. Admitted.

32. Defendant, EDWARDS, denies the allegations contained in paragraph 32 and demands strict proof thereof.

33. Defendant, EDWARDS, denies the allegations contained in paragraph 33 and demands strict proof thereof.

34. Defendant, EDWARDS, denies the allegations contained in paragraph 34 and demands strict proof thereof.

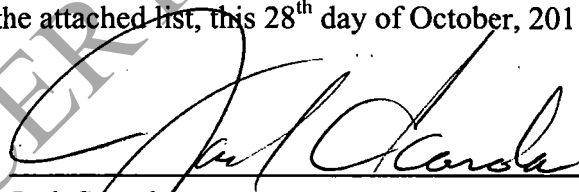
COUNT II: CONSPIRACY TO COMMIT ABUSE OF PROCESS—ROTHSTEIN

35. The allegations of paragraphs 35-39 are not directed to Defendant, EDWARDS, and are therefore not responded to.

AFFIRMATIVE DEFENSES

1. The actions of EDWARDS are absolutely protected from liability in accordance with the litigation privilege.
2. The actions of EDWARDS are qualifiedly protected in accordance with the litigation privilege.
3. The claims against EDWARDS are barred by the sword-shield doctrine.

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 28<sup>th</sup> day of October, 2011.

  
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