

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).

FILED

12 OCT -3 PM 4:03

SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 2

REQUEST TO PRODUCE

Counter-plaintiff, 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*:

1. All invoices, communications, reports, summaries, and other documents of any description constituting, reflecting, or relating directly or indirectly to any effort or the results of any effort to subject Bradley Edwards to surveillance or to otherwise monitor the movements or activities of Bradley Edwards.

*"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.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Request to Produce

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