

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).

MOTION TO FILE AMENDMENT TO THIRD AMENDED COUNTERCLAIM

Counter-plaintiff, BRADLEY J. EDWARDS, by and through his undersigned counsel, moves this Honorable Court to permit the filing of the accompanying Amendment to the Third Amended Counterclaim and in support thereof would show that on the eve of the summary judgment hearing scheduled to address Plaintiff, JEFFREY EPSTEIN'S, abuse of process claim against EDWARDS, EPSTEIN voluntarily dismissed that claim, bringing all claims against EDWARDS to a conclusion. The circumstances of that dismissal constitute a bona fide termination of the claim in EDWARDS' favor and provide the basis for the expansion of EDWARDS' currently pending malicious prosecution claims to encompass that recent development.

WHEREFORE, EDWARDS seeks leave to file the proposed Amendment and Order directing EPSTEIN's expedited response.

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CIRCUIT CIVIL PROCEDURE

Edwards adv. Epstein

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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 24th day of August, 2012.



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