

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 COMPEL PAYMENT OF DEPOSITION EXPENSES

Bradley J. Edwards, by and through his undersigned attorneys, moves this Honorable Court for entry of an Order compelling the Counter-defendant, Jeffrey Epstein, to pay the expenses incurred in the defense deposition of Expert, Bernard J. Jansen, Ph.D. Of the expenses indicated by an asterisk on the attached invoice, the only expense agreed to be paid is the December 1 expense of \$800.00 for 2 hours of deposition time.

WHEREFORE, it is respectfully requested that the Counter-defendant, Jeffrey Epstein, be required to pay all deposition-related expenses for this expert deposition totaling \$3,126.53.

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel Payment of Deposition Expenses

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 5th day of Dec., 2017.



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Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Motion to Compel Payment of Deposition Expenses

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Record of Expenses for Bernard J. Jansen, Jansen Expert Witnessing, LLC for the case, originally styled: JEFFREY EPSTEIN, Plaintiff, vs. SCOTT ROTHSTEIN, individually, BRADLEY J. EDWARDS, individually, and L. M., individually, Defendant, IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA. CASE NO.: 502009CA040800XX3OGMBAG

Date	Task	Start Time	Stop Time	Hours	Wages	Expense	Total	Comments
13-Nov	Email with Jack Scarola	7:20	7:32	0.00	\$-	\$-	\$-	no charge
13-Nov	Email with Jack Scarola	1:58	2:53	0.00	\$-	\$-	\$-	no charge
13-Nov	Email with Jack Scarola; Deposition dates; Market Research	9:05	10:00	0.50	\$200	\$-	\$200.00	
14-Nov	Email with Jack Scarola	4:46	5:08	0.00	\$-	\$-	\$-	no charge
14-Nov	Email with Jack Scarola	7:50	8:01	0.00	\$-	\$-	\$-	no charge
14-Nov	Email with Jack Scarola	8:56	8:56	0.00	\$-	\$-	\$-	no charge
14-Nov	Travel arrangements	9:30	10:01	0.00	\$-	\$-	\$-	no charge
14-Nov	Email with Tina L. Campbell; Email with Jack Scarola	1:27	2:04	0.00	\$-	\$-	\$-	no charge
15-Nov	Email with Mary McCann	4:55	4:55	0.00	\$-	\$-	\$-	no charge
15-Nov	Email with Tina L. Campbell	5:50	5:50	0.00	\$-	\$-	\$-	no charge
16-Nov	Email with Mary McCann	3:09	3:09	0.00	\$-	\$-	\$-	no charge
23-Nov	Travel arrangements	10:00	10:45	0.00	\$-	\$-	\$-	no charge
27-Nov	Documents together for depositions; review of documents	7:51	9:04	1.00	\$400	\$-	\$400.00	
28-Nov	Documents together for depositions; review of documents	8:00	8:17	0.25	\$100	\$-	\$100.00	
29-Nov	Email with Jack Scarola	5:55	6:00	0.00	\$-	\$-	\$-	no charge
30-Nov	Travel to Depo				\$-	\$-	\$-	
	Uber to airport				\$-	\$20.08	\$20.08	
	Travel time as per retainer			2.00	\$800	\$-	\$800.00	
	Rental				\$-	\$72.27	\$72.27	See attached
	Hotel				\$-	\$184.26	\$184.26	See attached
	Flight				\$-	\$428.00	\$428.00	Note: only charge flight from Charlottesville, VA even though flight was from Doha, Qatar
30-Nov	Depo Prep	1:10	3:43	2.50	\$1,000	\$-	\$1,000.00	
30-Nov	Email with Jack Scarola	6:15	7:30	0.00	\$-	\$-	\$-	no charge
1-Dec	Depo Prep; Downloaded documents; Review of documents; review of report; Review of cv, Review of all supporting documents; Review of all webpages; Review of traffic services; Review of traffic reports	3:00	7:30	4.50	\$1,800	\$-	\$1,800.00	
1-Dec	Depo Prep	8:10	9:10	1.00	\$400	\$-	\$400.00	
1-Dec	Deposition	9:20	11:20	2.00	\$800	\$-	\$800.00	
1-Dec	Travel from Depo				\$-	\$-	\$-	
	Travel time as per retainer			2.00	\$800	\$-	\$800.00	
	Taxi from airport				\$-	\$21.92	\$21.92	No receipt

Date	Task	Start Time	Stop Time	Hours	Wages	Expense	Total	Comments
				15.75	\$6,300	Total	\$7,026.53	
					\$726.53			
					\$7,026.53		\$7,026.53	

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