

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).

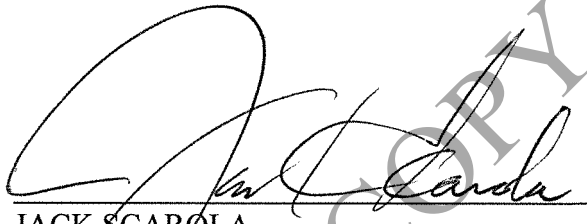
MOTION TO COMPEL PAYMENT OF DEPOSITION EXPENSES

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.: 502009CA040800XX30GMBAG

| 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 |

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| 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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