

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,

GENERAL OBJECTIONS TO UNTIMELY COMPOSITE EXHIBITS

Counter-Plaintiff, Bradley J. Edwards, by and through undersigned counsel, hereby files this General Objections to Untimely Composite Exhibits, and as grounds therefor states as follows:

1. At the December 5, 2017 special-set hearing, the Court ordered Counter-Plaintiff to produce copies of any exhibits that had not previously been produced by no later than December 20, 2017. (12/5/17 Tr. 216, 219, 226, 228).

2. That ruling was memorialized in the Court's January 16, 2018 Order on Plaintiff/Counter-Defendant Jeffrey Epstein's Revised Omnibus Motion in Limine Section B (Edwards' Trial Exhibits), as follows:

On or before December 20, 2017, Edwards shall produce to Epstein all trial exhibits that have not been previously produced in the form to be introduced at trial . . .

3. Yet on February 2, 2018, undersigned counsel received letter correspondence from Epstein's counsel, which enclosed a flash drive "containing additional documents for [Epstein]'s

trial Exhibit Nos. 18, 35, 48, 323 and 324. We are still obtaining additional public records and will provide those to you upon our receipt.” The numbered exhibits are ‘catch-alls’ as follows:

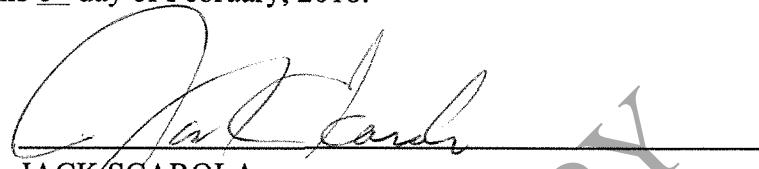
- a. #18 – Court docket and all court filings referenced therein for L.M. v Jeffrey Epstein, case no. 50-2008-CA-028051;
- b. #35 – Court docket and all court filings referenced therein for E.W. v. Jeffrey Epstein, case no. 50-2008-CA-028058;
- c. #48 – Court docket and all court filings reference therein for Jane Doe v. Jeffrey Epstein, case no. 08-cv-80893;
- d. #323 – All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party;
- e. #324 – All court dockets and filings in all matters against Jeffrey Epstein relating to any victim’s claims.

4. Edwards objects to all such late produced exhibits, whether contained in the February 2, 2018 flash drive or intended to be produced in the future, as violative of the Court’s December 5, 2017 ruling and January 16, 2018 order.

5. Additionally, the Court has previously ruled that, with regard to any “catch-all” exhibits listed on either party’s exhibit list, the party must separately identify and list individually each exhibit sought to be relied upon by the listing party.

6. Edwards therefore reserves all objections to all composite exhibits that fail to comply with this order by the Court.

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 6th day of February, 2018.



JACK SCAROLA
Florida Bar No.: 169440
DAVID P. VITALE JR.
Florida Bar No.: 115179
Attorney E-Mail(s): jsx@searcylaw.com and
mmccann@searcylaw.com
Primary E-Mail: ScarolaTeam@searcylaw.com
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for Plaintiff(s)

NOT A CERTIFIED COPY

COUNSEL LIST

Bradley J. Edwards, Esquire
staff.efile@pathtojustice.com
425 N Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Jack A. Goldberger, Esquire
jgoldberger@agwpa.com; smahoney@agwpa.com
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue S, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691
Attorneys for Jeffrey Epstein

Nichole J. Segal, Esquire
njs@FLAppellateLaw.com; kbt@FLAppellateLaw.com
Burlington & Rockenbach, P.A.
444 W Railroad Avenue, Suite 350
West Palm Beach, FL 33401
Phone: (561)-721-0400
Attorneys for Bradley J. Edwards

Scott J. Link, Esquire
Eservice@linkrocklaw.com; Scott@linkrocklaw.com; [Kara@linkrocklaw.com](mailto>Kara@linkrocklaw.com);
Angela@linkrocklaw.com; Tanya@linkrocklaw.com; tina@linkrocklaw.com
Link & Rockenbach, P.A.
1555 Palm Beach Lakes Boulevard
Suite 301
West Palm Beach, FL 33401
Phone: (561)-727-3600
Fax: (561)-727-3601
Attorneys for Jeffrey Epstein

Marc S. Nurik, Esquire
marc@nuriklaw.com
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301

Case No.: 502009CA040800XXXXMBAG
General Objection to Untimely Composite Exhibits
Page 5 of 5

Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein

NOT A CERTIFIED COPY