

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 6<sup>th</sup> 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;  
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