

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS, individually, and
L.M., individually,

Defendant(s).

**DEFENDANT/COUNTERPLAINTIFF, EDWARDS' RENEWED MOTION FOR LEAVE
TO ASSERT CLAIM FOR PUNITIVE DAMAGES**

Counter-plaintiff, BRADLEY J. EDWARDS, moves this Honorable Court for entry of an Order granting him leave to assert a claim for punitive damages against the Counter-defendant, JEFFREY EPSTEIN, and in support thereof would show that the record evidence presented to the Court in support of Edwards' Motion for Summary Judgment satisfies the statutory prerequisites for the assertion of a punitive damage claim. Specifically, the evidence establishes that EPSTEIN's Complaint against EDWARDS;

1. was filed in the total absence of evidence to support any allegation of wrongdoing on the part of EDWARDS;
2. was filed in the total absence of evidence that EPSTEIN had sustained damage as a consequence of any misconduct other than his own well-established criminal enterprise;

SHARON R. BOCK, CLERK
PALM BEACH COUNTY
CIRCUIT COURT

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FILED

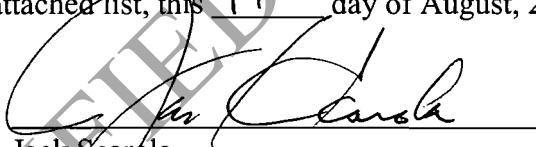
Edwards adv. Epstein

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3. was filed in the absence of any intention to meet his own obligation to provide relevant and material discovery;
4. was filed for the sole purpose of attempting to intimidate both EDWARDS and EDWARDS' clients and others into abandoning their legitimate claims against EPSTEIN.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic and U.S. Mail to all Counsel on the attached list, this 17th day of August, 2012.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for BRADLEY J. EDWARDS

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COUNSEL LIST

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

Bradley J. Edwards, Esquire
brad@pathtojustice.com
Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, FL
425 North Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Marc S. Nurik, Esquire
marc@nuriklaw.com
Law Offices of Marc S. Nurik
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: (954)-745-5849
Fax: (954)-745-3556
Attorneys for Scott Rothstein

Tonja Haddad Coleman, Esquire
tonja@tonjahaddadpa.com
Law Offices of Tonja Haddad, P.A.
524 S Andrews Avenue, Suite 200N
Fort Lauderdale, FL 33301
Phone: (954)-467-1223
Fax: (954)-337-3716
Attorneys for Jeffrey Epstein

Lilly Ann Sanchez, Esquire
lsanchez@thelsfirm.com
The L-S Law Firm
1441 Brickell Avenue, 15th Floor
Miami, FL 33131
Phone: (305)-503-5503
Fax: (305)-503-6801
Attorneys for Jeffrey Epstein