

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).

2011 APR -5 PM 3:30  
FILED  
SHARON R. BOC, CLERK  
PALM BEACH COUNTY  
CIRCUIT COURT

**DEFENDANT'S MOTION TO PERMIT ADDITIONAL INTERROGATORY**

The Defendant, Bradley J. Edwards, by and through the undersigned attorneys, moves this Honorable Court to enter an order Permitting Defendant, Jeffrey Epstein, to propound an additional interrogatory upon Plaintiff, Jeffrey Epstein, and states:

1. The Supreme Court has not approved a form of interrogatories for this type of action.
2. The elements of the claims asserted and the nature and complexity of the factual circumstances giving rise to the claims are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.
3. The elements of defenses asserted or expected to be asserted are not susceptible to being adequately covered within the twenty-five (25) interrogatory limit.

Case No.: 502009CA040800XXXXMBAG  
Motion to Compel

4. The use of written interrogatories is the least burdensome, least expensive and most expeditious discovery means available to the Defendant by which to obtain necessary information and narrow trial issues.

5. The Plaintiff will not be prejudiced through the granting of this motion.

6. The foregoing factors and others to be presented upon hearing of this Motion constitute good cause for increasing the number of interrogatories permitted herein.

WHEREFORE, Defendant moves for an Order requiring permitting Defendant, Jeffrey Epstein, to propound an additional interrogatory upon Plaintiff, Jeffrey Epstein.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by ~~FAX AND~~  
U.S. Mail to all Counsel on the attached list, this 11 day of April, 2011.

  
\_\_\_\_\_  
Jack Scarola  
Florida Bar No.: 169440  
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)

**COUNSEL LIST**

Jack A. Goldberger, Esquire  
[jgoldberger@agwpa.com](mailto:jgoldberger@agwpa.com);  
[smahoney@agwpa.com](mailto: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

Farmer, Jaffe, Weissing, Edwards, Fistos &  
Lehrman, PL  
425 N. Andrews Avenue, Suite 2  
Fort Lauderdale, FL 33301  
Phone: (954)-524-2820  
Fax: (954)-524-2822  
Attorneys for Jeffrey Epstein

Joseph L. Ackerman, Jr., Esquire  
[jla@fowler-white.com](mailto:jla@fowler-white.com)  
Fowler White Burnett, P.A.  
901 Phillips Point West  
777 S Flagler Drive  
West Palm Beach, FL 33401-6170  
Phone: (561)-802-9044  
Fax: (561)-802-9976  
Attorneys for Jeffrey Epstein

Marc S. Nurik  
[marc@nuriklaw.com](mailto: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