

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).

FILED
2011 APR -5 PM 3:38
SHARON R. BOCHNER, CLERK
PALM BEACH COUNTY
CIRCUIT CIVIL

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.

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Motion to Compel

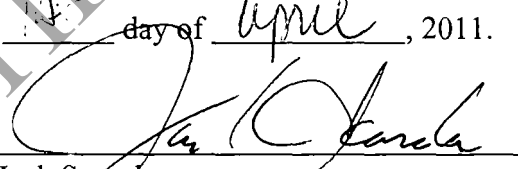
4. The use of written interrogatories is the least burdensome, least expensive and most expeditious discovery means available to the Defendant by which to obtain necessary information and narrow trial issues.

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 14 day of April, 2011.



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