

IN THE CIRCUIT COURT OF THE 15<sup>th</sup> JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA

CIVIL DIVISION AG  
CASE NO. 502009CA040800XXXXMB  
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

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**NOTICE OF PROPOUNDERING PLAINTIFF'S THIRD SET OF INTERROGATORIES  
TO DEFENDANT/COUNTER-PLAINTIFF BRADLEY J. EDWARDS**

Plaintiff Jeffrey Epstein hereby propounds his Third Set of Interrogatories to Defendant/Counter-Plaintiff Bradley J. Edwards on this 9<sup>th</sup> day of December, 2011 and requests that the attached Interrogatories be answered within 30 days of service at the offices of Fowler White Burnett PA, 901 Phillips Point West, 777 South Flagler Drive, West Palm Beach, FL 33401.

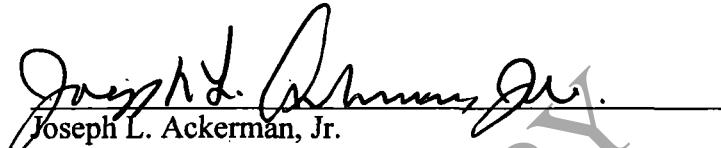
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by e-mail and U.S. Mail on this 9<sup>th</sup> day of December, 2011 on: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue

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South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301.

  
Joseph L. Ackerman, Jr.  
Florida Bar No. 235954

FOWLER WHITE BURNETT, P.A.  
901 Phillips Point West  
777 South Flagler Drive  
West Palm Beach, Florida 33401  
Telephone: (561) 802-9044  
Facsimile: (561) 802-9976  
Attorneys for Plaintiff Jeffrey Epstein

**DEFINITIONS AND INSTRUCTIONS**

1. The term "Edwards," "you" or "your" means the party or parties to whom these interrogatories are addressed, i.e., Defendant/Counter-Plaintiff Bradley J. Edwards, including all persons acting or purporting to act on his behalf.
2. "Second Amended Counterclaim" means the Second Amended Counterclaim which you served on November 29, 2011 on the Plaintiff/Counter-Defendant Jeffrey Epstein in this action.
3. The term "witness" means any natural person, individual, proprietorship, partnership, limited liability company, corporation, affiliate, subsidiary, association, organization, joint venture, firm, other business enterprise, governmental body, group of natural persons or other entity.
4. The terms "identify," "describe" or "provide" when used with reference to a natural person means:
  - A. the full name, current telephone number(s) and current business and home addresses (or, if the current telephone numbers and/or current business and home addresses are not known, the last known telephone numbers and/or business and home addresses) of the person. Address shall include the street and post office box, if known, and the city, state, country and zip code;
  - B. the full name and address of each employer, each corporation of which the person is an officer or director, each limited liability company of which the person is a manager

or a member, each partnership of which the person is a partner, and each other business in which the person is a principal;

C. the person's current (or, if the current is not known, the last known) position and the position or positions held by the person at the time of the act to which the interrogatory answer relates; and

D. such other information as is sufficient to provide full identification of the person.

5. The terms "identify," "describe" or "provide" when used with reference to any entity other than a natural person means:

A. the full name of the entity, the type of entity (e.g., corporation, limited liability company, partnership, etc.), the address of its principal place of business, its principal business activity, the jurisdiction under the laws of which it has been organized and the date of such organization;

B. each of the entity's officers, directors, shareholders, managers, members, partners, or other principals.

C. any other available information concerning the existence or identity of the entity.

6. The terms "identify," "describe" or "provide" when used with reference to a document means:

A. the name or designation of the document;

B. the name of the person(s) who participated in the creation of the document;

C. the date of the document;

D. the person or entity to whom the document is addressed (if any) and those to whom any copies of the document were addressed or delivered;

E. a brief description of the contents of the document; and

F. all signatories to the document.

7. "Document" means any agreement, contract, letter, correspondence, memorandum, report, calendar, diary, appointment book, log, record (including business, financial and medical records), ledger, audit, bill, invoice, statement, schedule, recording of sound or photographs, electronic file (whether on disk, tape, drive or otherwise), printout, writing, drawing, sketch, notes (handwritten or otherwise), map, blueprint, e-mail, data compilation, and written or recorded material of any kind and character.

8. "Referring to," "reflecting," "evidencing" or "relating to" means in any way, directly or indirectly, concerning, referring to, disclosing, describing, confirming, supporting, evidencing or representing.

9. "And" and "or" shall be construed in the disjunctive or conjunctive as necessary in order to bring within the scope of each interrogatory which might otherwise be construed to be outside its scope.

10. "Person" means any individual natural person, partnership, association, firm, limited liability company, corporation, organization, trust, governmental or public entity, and any

of the officers, directors, shareholders, members, managers, partners, principals, agents, employees, assigns or representatives of the same.

11. "Substantiate," "state" or "explain" means to set forth the circumstances or bases for any belief, contention or position or to give information or direction in response to a question.

12. If all the information furnished in an answer to all or part of an interrogatory is not within your personal knowledge, identify each person to whom all or part of the information furnished is a matter of personal knowledge and each person who communicated to you any part of the information furnished.

13. If the answer to all or any part of the interrogatory is not presently known or available to you, include a statement to that effect, furnish the information known or available, and respond to the entire interrogatory by supplemental answer, in writing, under oath, within ten days from the time the entire answer becomes known or available, and in any event, no less than ten days prior to trial.

14. Whenever, in any answer to any interrogatory, a reference is made to one or more persons, specify by name, the particular person to whom the reference is intended.

**INTERROGATORIES**

1. Identify each and every fact that supports the allegations set forth in your Second Amended Counterclaim, by providing:

a. a detailed description of the damages you allege you have suffered, including, but not limited to, those you claim have resulted in

- (1) injury to your reputation, and
- (2) interference in your professional relationships; and

b. a detailed description of the special damages you allege that you have suffered, including, but not limited to

(1) the loss of the value of your time diverted from your professional responsibilities, and

(2) the cost of defending claims against you in this lawsuit.

2. Explain in detail how your reputation has been injured as a direct result of this action against you from the filing of this action to the present. With specificity, identify the following:

a. Your alleged reputation prior to the filing of this action;

b. Any and all persons who have made statements about your reputation after the filing of this action;

c. Any and all communications, whether verbal or written, made about your reputation; and

d. The date, manner, and substance of communications in which said statements have been made about your reputation.

3. Explain in detail how the filing of this action against you has interfered with your professional relationships and for each such relationship:

- a. identify its nature and the person with whom you have or had the relationship;
- b. specify exactly how the relationship has been interfered with;
- c. identify each person with knowledge of the interference; and
- d. identify actual damages as a result of such interference.

4. Identify each and every witness that has knowledge of the damages you seek to recover in this action, including but not limited to your employer, your partners, your family members, associates, colleagues, referral sources, and clients and, for each, describe the nature of his or her knowledge.

5. Explain the basis for your claim that your reputation has been injured by the allegations against you in this action.

6. Explain the method by which you have distinguished injury to your reputation resulting directly from allegations against you in this action from injury to your reputation resulting from your having been a partner in the defunct firm of Rothstein Rosenfeldt & Adler.

7. Identify all fees and costs that you have incurred for the defense of this action against you.

8. If you have a written engagement agreement with the firm of Searcy Denny Scarola Barnhart & Shipley, P. A., describe the date of the agreement, the scope of services and the terms on which your counsel are to be compensated.

9. If you do not have a written engagement agreement with the firm of Searcy Denny Scarola Barnhart & Shipley, P. A., describe the terms of your oral representation agreement, the scope of services and the terms on which your counsel are to be compensated.

10. Identify any other attorney and firm with whom you have any relationship in connection with your defense of this action.

11. If you (or another on your behalf) have paid any legal fees and costs incurred for the defense of this action, provide the amounts paid and the date of each payment.

12. State, by week or month, the amount of hours that you devoted to your professional work since the filing of this action against you (in 2009, 2010 and 2011) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

13. State, by week or month, the amount of hours that you have devoted to your professional work during the two years prior to the filing of this action against you (in 2007 and 2008) and describe in detail the source of this information (e.g., time sheets, personal diary, manual or computer calendar).

14. State the amount of gross income that you received from providing services as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011 and identify the source of that income (including the payor of the same).

15. State the amount of gross income that you received from the provision of goods or services other than while acting as a lawyer for each of the years 2007, 2008, 2009, 2010 and 2011 and identify the source of that income (including the payor of the same).

16. State the amount of hours that you have devoted to pro bono work for the years 2007, 2008, 2009, 2010 and 2011 and substantiate your answer with the names of the cases or causes for which you provided such service.

17. You claim damages for emotional distress, embarrassment, and mental anguish as a result of this action against you. Have you sought professional medical or psychological services? If so,

- a. identify each provider of such services;
- b. state the dates during which you received treatment or assistance for such services; and
- c. state the amount of money you have paid for such services.

18. If you have not sought professional medical or psychological services, please explain why.

19. If you claim to have suffered any loss of income, wages, or other remuneration as a result of the claims made against you in this action, describe in detail

- a. the nature of the lost income, whether by wages or other remuneration (e.g., loss of clients, loss of earnings for hours engaged in the practice of law, etc.);
- b. the amount of lost income, whether by wages or other remuneration, for each period for which you typically receive the above (e.g., if you bill or otherwise keep track of

legal services you provide by the hour, the number of hours which you were unable to perform such services for each month) since the filing of this action;

- c. the duration of the loss, i.e., the date the loss commenced and concluded;
- d. the basis for determining the loss, i.e., identify the specific client and matter; and
- e. the method used in calculating your loss of income, whether by wages or other remuneration, for the period you have claim to have suffered damages.

20. If you are claiming that you have suffered loss of future earning capacity as a result of the allegedly wrongful conduct, describe with specificity:

- a. the duration of the lost future earning capacity,
- b. the amount of the lost future earning capacity, and
- c. the basis for your calculation.

21. If you are claiming to have lost business or employment opportunities as a result of the allegedly wrongful conduct of the plaintiff, describe each with specificity and, for each, state the amount of money damages you seek to recover.

22. Describe the method used in calculating your loss of future earnings.

23. With respect to each alleged lost business opportunity, please state for each the following:

- a. the name and address of the employer, client, attorney or entity who offered or presented the business opportunity that you claim was lost;
- b. the nature and scope of work involved in the lost business opportunity;

c. the amount of compensation or remuneration you estimated that you would earn or be paid had you undertaken the opportunity and the basis for that estimation; and

d. the date you determined that you had lost the business opportunity.

24. State each instance in which you have spoken to or communicated with the press or any other media representative relating to Plaintiff Jeffrey Epstein. Provide the identity of each contact, the date of the contact, and a description of the communication.

25. Identify the confidential source(s) listed on your Privilege Log in this case dated February 23, 2011.

26. Identify the legal basis for including a confidential source in your Privilege Log.

27. Provide an explanation for your belief that law enforcement is still investigating the Plaintiff/Counter-Defendant Jeffrey Epstein. Identify contacts with government/law enforcement, media, other attorneys, or anyone else from which you claim to form this belief, including the names, dates, substance of communication, etc.

28. Identify the basis for your claim that others still persist in prosecuting claims against the Plaintiff/Counterdefendant Jeffrey Epstein. Identify the persons still prosecuting claims against the Plaintiff/Counterdefendant or with knowledge of the persons still prosecuting claims against him, including names, dates of contact with such persons, substance of communication, etc.

29. Provide support for your claims in Paragraphs 9 and 25 of the Second Amended Counterclaim in which you allege the sole purpose of filing civil claims was never to recover monetary damages, that Plaintiff/Counter-Defendant Jeffrey Epstein knew he never suffered monetary damages, and that he knowingly asserted baseless and unsupportable claims, etc.

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30. Identify all clients and list all payments made to clients in connection with their cases against the Plaintiff/Counter-Defendant Jeffrey Epstein.

31. Identify all third parties (non-clients) who received or made payments in connection with the client cases or purported client cases against the Plaintiff/Counter-Defendant Jeffrey Epstein and with specificity: 1) explain the relationship of such third parties; 2) list the payments made to or by each; and 3) list the date of payments and purpose of payments. Your answer should include without limitation all investigators, witnesses, referring persons, referring attorneys, outside counsel, outside experts. It should also include any and all payments made to or by investors in any of the client cases against the Plaintiff/Counter-Defendant Jeffrey Epstein or payments made by or to any other person in connection with the client cases.

32. Identify all attorneys who worked on the client cases against Plaintiff/Counter-Defendant Jeffrey Epstein, including, but not limited to, the attorneys formerly at Rothstein Rosenfeldt & Adler; the attorneys at Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL; outside attorneys and referring attorneys.

33. Identify all members of support staff, paralegals, secretaries, investigators, etc. who worked on client cases against the Plaintiff/Counter-Defendant Jeffrey Epstein, including, but not limited to, Bradley Edwards' office; the attorneys formerly at Rothstein Rosenfeldt & Adler; the office of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, PL; and offices of outside attorneys and referring attorneys.

34. Identify any agreements, proposals, offers, discussions, negotiations, etc. related to the sale or development of any movie, book, or other rights or similar deals.

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Under penalty of perjury, I do hereby swear and affirm that the answers to the foregoing interrogatories are true and correct.

BRADLEY J. EDWARDS

STATE OF FLORIDA )  
 )ss.  
COUNTY OF \_\_\_\_\_ )

The foregoing instrument was acknowledged before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, by BRADLEY J. EDWARDS, who  is personally known to me or  has produced \_\_\_\_\_ as identification, and who did (did not) take an oath.

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

{SEAL}

Signature of Notary Public

Print Name: \_\_\_\_\_

My Commission Expires: \_\_\_\_\_