

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).

MOTION TO RESOLVE DISCOVERY-RELATED ISSUES

Bradley J. Edwards, by and through his undersigned counsel, moves this Honorable Court to resolve issues raised in the attached Joint Discovery Schedule as to the scope of discovery and mediation.

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 7th day of May, 2015.



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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
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CIRCUIT CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

JOINT DISCOVERY SCHEDULE

Pursuant to this Court's Order, dated April 22, 2015, counsel for Plaintiff/Counter-Defendant, JEFFREY EPSTEIN ("EPSTEIN"), and counsel for Defendant/Counter-Plaintiff, BRADLEY J. EDWARDS ("EDWARDS"), hereby agree to the following Joint Discovery Schedule:

1. **DISCLOSURES**

EPSTEIN shall disclose to EDWARDS by **FRIDAY - JUNE 5, 2015¹** - all attorney time records and agreements for legal services rendered in connection with this matter. These records may be redacted to properly protect any attorney/client and/or work product information. EPSTEIN does not agree that attorney time records for services performed prior to the effective date of the Proposal for Settlement should be produced. The Court will be asked to determine this issue.

EPSTEIN shall disclose all taxable costs claimed by him, as well as all agreements/invoices pursuant to which the fees and costs were incurred, as well as any and all documents reflecting payment of same by **WEDNESDAY - JULY 15, 2015**.

2. **EXHIBITS**

The parties shall exchange lists of all hearing exhibits no later than **MONDAY - JULY 20, 2015**.

¹ Because Appellate Fees have yet to be addressed by the Court, this Discovery Order is inapplicable to those costs and fees and may be amended/modified upon the Court's ruling on same.

3. **WITNESSES**

The parties shall exchange Lists of names and addresses of all Witnesses and Expert Witnesses - no later than **FRIDAY, JUNE 19, 2015**. **Rebuttal witnesses shall be disclosed no later than FRIDAY, JULY 10, 2015.**

For all Expert Witnesses, the parties shall provide:

- a. the subject matter about which the Expert is expected to testify;
- b. the substance of the facts and opinions to which the Expert is expected to testify;
- c. a copy of any written reports issued by the Expert regarding this case; and
- d. a copy of the Expert's curriculum vitae

4. **DISCOVERY**

All discovery must be completed no later than **FRIDAY, JULY 31, 2015**.

5. **MEDIATION**

The parties are in agreement that there is absolutely no chance of a successful Mediation prior to resolution of pending appellate issues.

DATED this _____ day of _____, 2015.

TONJA HADDAD COLEMAN, ESQ.
Florida Bar No. 176737

AND

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By: _____

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