

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S MOTION TO SHORTEN  
TIME TO RESPOND TO EXPERT INTERROGATORIES, REQUEST TO PRODUCE  
REGARDING EXPERTS AND NOTICE OF INTENT TO SERVE SUBPOENAS UPON  
LATE-DISCLOSED EXPERTS**

Plaintiff/Counterclaim Defendant Jeffrey Epstein ("Plaintiff"), moves to shorten the time for Defendant/Counterclaim Plaintiff Bradley J. Edwards ("Defendant") to respond to his Request to Produce Regarding Experts (**Exhibit A**) and Interrogatories Regarding Experts (**Exhibit B**) and raise objections to his Notice of Intent to Serve Subpoenas for Documents upon Defendant's newly (and late) disclosed experts (**Exhibit C**), and in support thereof, states:

1. On November 9, 2017, Defendant filed his Seventh Amended and Supplemental Witness List which, for the first time, disclosed an additional eight expert witnesses. *See* Amended and Supplemental Witness List (**Exhibit D**). No reports were provided by any of these expert witnesses.

2. Under this Court's Trial Order, the disclosure of expert witnesses was due more than thirty days ago.

3. The disclosure of these expert witnesses necessitates substantial additional discovery by Plaintiff on the opinions and background of these expert witnesses. Because of the late disclosure, however, Plaintiff is unable to wait the length of time under Florida Rules of Civil Procedure 1.340 and 1.350 for a response from Defendant, or the response will be due after the discovery deadline and, even more importantly, after the trial, which is currently scheduled to start on December 5, 2017.<sup>1</sup> Similarly, under Rule 1.351, if Plaintiff was required to wait 10, or 15, days to allow Defendant time to object before serving subpoenas on these new experts, Plaintiff would be effectively denied the right to conduct discovery, as Plaintiff would not have time to serve the subpoenas and allow a reasonable time for production by these experts.

4. For these reasons, and so that Plaintiff has adequate time to conduct additional discovery on these late-disclosed expert witnesses, Plaintiff requests that this Court grant his Motion for Continuance in the Trial. In the alternative, Plaintiff requests that this Court shorten the time for Defendant to respond to the discovery and for Defendant to raise objections to the Notice of Intent to three days, so such responses and objections are made by November 16, 2017.

WHEREFORE, Plaintiff respectfully requests that this Court grant the relief sought herein, along with any other relief this Court deems necessary and just.

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<sup>1</sup> Plaintiff filed a Motion for Continuance of Trial, which was heard by this Court on November 7, 2017. This Court took the Motion under advisement, and has not yet ruled, but this late disclosure (after that hearing) is yet another reason that a continuance is not only appropriate, but necessary in this case.

### **CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 13, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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*Trial Counsel for Plaintiff/Counter-Defendant*  
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# EXHIBIT A

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S REQUEST TO  
PRODUCE TO DEFENDANT/COUNTERCLAIM PLAINTIFF BRADLEY J. EDWARDS  
REGARDING EXPERTS**

Plaintiff/Counter-Defendant, Jeffrey Epstein, pursuant to Florida Rule of Civil Procedure 1.350, requests that Defendant/Counter-Plaintiff, Bradley J. Edwards, produce the following documents within the time permitted under Rule 1.350 or a shorter time as the Court may order pursuant to Plaintiff/Counter-Defendant's Motion to Shorten the Time to Respond.

**DEFINITIONS**

1. "*Communication*" or "*communications*" mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;
- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages,

and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and

- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer, server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s



terms are the same as or different from the final *document's* terms. Please note that "*Document*" and "*Documents*" as defined herein specifically include "*Communication*" and "*Communications*" as defined above.

3. "*Native Format*" means the file format of *ESI* in the application in which such *ESI* was originally created.

4. "*Person*" as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms "*you*" or "*your*" mean Bradley J. Edwards and his representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. "*Relates to*" or "*relating to*" mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing, evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. "*Lawsuit*" means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. “*Experts*” refers to all expert witnesses disclosed on your Seventh Amended and Supplemental Witness List dated November 9, 2017, and all other individuals you intend to elicit expert testimony from at the trial of this matter including, but not limited to, Bernard J. Jansen, Robert C. Josefsberg, Charles Lichtman, Spencer Kuvin, Theodore Leopold, Adam Horowitz, Isidro M. Garcia, Earleen Cote and William Berger.

11. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Request for Production, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each Request, the relevant time period shall be the period from January 1, 2008 to the present.

### ESI Instructions

3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Request for Production is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the

endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.

- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.
- d. Where *TIFF* Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request *Native Format* files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTS FOR PRODUCTION**

1. All correspondence between you and the Experts relating to the subject matter of the Lawsuit, the claims or defenses of the Lawsuit, or the Experts' opinions in relation to the Lawsuit.
2. All correspondence between you and the Experts relating to the Other Lawsuits.
3. All correspondence between the Experts and any persons relating to the Lawsuits.
4. All correspondence between the Experts and any persons relating to the Other Lawsuits.

5. All billing records, invoices, or statements and any and all retainer agreements, engagement letters or other contracts, relating to services performed, or to be performed, by the Experts in this Lawsuit or any of the Other Lawsuits.

6. All versions (including draft versions, final versions, current versions and prior versions) of resumes, *curriculum vitas* and biographies for the Experts.

7. All reports, and all draft versions of those reports, that have been prepared by the Experts or at the direction of the Experts in relation to their involvement in this Lawsuit. These reports include any written reports, whether typed, handwritten, printed, maintained as electronically stored information, or audio recorded.

8. All documents drafted by the Experts relating to the subject matter, or claims or defenses, of the Lawsuit.

9. Copies of any notes made by the Experts, or provided to the Experts in relation to that Experts' services in this Lawsuit.

10. All documents provided by you to the Experts in relation to the services being provided by the Experts in this Lawsuit.

11. All deposition transcripts, portions of deposition transcripts, or other statements or written materials provided by you to the Experts in relation to the services being provided by the Experts in this Lawsuit.

12. Any documents prepared by the Experts, provided to the Experts, obtained by the Experts, or reviewed by the Experts, whether intended for their use or not, in connection with this Lawsuit which concern the subject matter of the case.

13. All literature and documents that the Experts considered relevant to their assignment in this case and which they considered in the development of their opinions or conclusions concerning the subject matter of the Lawsuit.

14. All documents prepared by the Experts to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to the Experts' assignment, investigation, or opinions.

15. Without limitation to the time set forth in Instruction No. 2, copies of any articles, books, papers or other publications prepared by the Experts which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.

16. Any and all materials considered, consulted, and used by the Experts as a basis or predicate for their opinions and conclusions, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents provided by you, or government or industry standards or regulations.

17. Any and all models or demonstrative tools upon which the Experts have or plan to rely, in the formulation and expression of their opinions and conclusions concerning the subject matter of this Lawsuit.

18. All expert reports, testimony or affidavits of the Experts for any other matter given or made in the last ten years.

### **CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 13, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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# EXHIBIT B

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE  
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FOR PALM BEACH COUNTY, FLORIDA

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JEFFREY EPSTEIN,

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v.

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

Defendants/Counter-Plaintiff.

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**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S NOTICE OF SERVICE  
OF INTERROGATORIES TO DEFENDANT/COUNTERCLAIM PLAINTIFF  
BRADLEY J. EDWARDS REGARDING EXPERTS**

Plaintiff/Counter-Defendant, Jeffrey Epstein, pursuant to Florida Rule of Civil Procedure 1.340, hereby gives notice of his service of Interrogatories Regarding Experts upon Defendant/Counter-Plaintiff, Bradley J. Edwards, on November 13, 2017.

### **CERTIFICATE OF SERVICE**

I certify that this Notice been furnished to the attorneys listed on the Service List below on November 13, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1) and a copy of the Notice and Interrogatories have been served via e-mail.

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Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i>	Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i>
Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	Fred Haddad Haddad & Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>
W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcblaw@aol.com">wcblaw@aol.com</a> <a href="mailto:wcblawasst@gmail.com">wcblawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S INTERROGATORIES  
TO DEFENDANT/COUNTERCLAIM PLAINTIFF BRADLEY J. EDWARDS  
REGARDING EXPERTS**

Plaintiff/Counter-Defendant, Jeffrey Epstein, pursuant to Florida Rule of Civil Procedure 1.340, hereby propounds the following Expert Interrogatories to Defendant/Counter-Plaintiff, Bradley J. Edwards, and requests that he answer the Interrogatories, in writing and under oath, within the time permitted under Rule 1.340 or a shorter time as the Court may order pursuant to Plaintiff/Counter-Defendant's Motion to Shorten the Time to Respond.

**DEFINITIONS**

1. "Communication" or "communications" mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues,

discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;
- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser

discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and

- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer, server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the



term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Bradley J. Edwards and his representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing, evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. “*Experts*” refers to all expert witnesses disclosed on your Seventh Amended and Supplemental Witness List dated November 9, 2017, and all other individuals you intend to elicit expert testimony from at the trial of this matter including, but not limited to, Bernard J. Jansen, Robert C. Josefsberg, Charles Lichtman, Spencer Kuvin, Theodore Leopold, Adam Horowitz, Isidro M. Garcia, Earleen Cote and William Berger.

11. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INTERROGATORIES**

### **Interrogatory No. 1:**

For each Expert, please state the subject matter on which the Expert is expected to testify, the date that the Expert was retained, the facts and opinions which the Expert is expected to testify to, and a summary of the grounds on which each of the opinions are based.

**Interrogatory No. 2:**

For each Expert, please identify any documents, reports, publications, or other written opinions prepared by the Expert relating to the Expert's opinions in this matter.

**Interrogatory No. 3:**

For each Expert, please provide:

- (a) the names of all professional associations or societies with which he or she is related or a member of, stating his or her status with each and inclusive dates of such status;
- (b) his or her educational background; and
- (c) his or her work history, including name of employer, organization with which associated, address of employer or organization, dates of employment or association and general description of work performed in the last twenty-five years.

**Interrogatory No. 4:**

For each Expert, please state whether he or she has ever been retained, deposed or testified as an expert witness in any other lawsuit and, if so, for each such lawsuit, give the style of the case, the kind of suit involved, the name of the court, the approximate date of the testimony; and the name and address of the parties and attorneys for whom he or she testified, and the area or field in which he or she was qualified as an expert.

**Interrogatory No. 5:**

For each Expert, please state the percentage of the Expert's earned income derived from serving as an expert witness.

**Interrogatory No. 6:**

For each Expert, please state whether the Expert has ever been retained in the past by you or any of your attorneys as an expert witness, and, if so, the style of the case in which the Expert was retained, and the amount paid or consideration received for the service rendered by the Expert.

**Interrogatory No. 7:**

For each Expert, please state whether the Expert has ever been retained in the past by you or any of your attorneys as an attorney, and, if so, the style of the case in which the Expert was retained, and the amount paid or consideration received for the service rendered by the Expert.

**Interrogatory No. 8:**

For each Expert, please provide a complete list of all materials reviewed, consulted, or relied upon in forming his or her opinion, including all depositions, documents, publications, exhibits, plans, drawings, ordinances, statutes, etc.

By: \_\_\_\_\_  
Bradley J. Edwards

STATE OF FLORIDA )

COUNTY OF PALM BEACH )

The foregoing instrument was acknowledged before me this \_\_\_\_ day of \_\_\_\_\_, 2017, by Bradley J. Edwards, who is \_\_\_\_ personally known to me or \_\_\_\_ produced \_\_\_\_\_ as identification who, after being duly sworn, on penalty of perjury, deposes and states that the foregoing Answers to Interrogatories are true to the best of his/her knowledge, information and belief.

\_\_\_\_\_  
Notary Public, State of Florida

My Commission expires:

# EXHIBIT C

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S NOTICE OF  
PRODUCTION FROM NON-PARTIES**

YOU ARE NOTIFIED that after 10 days from the date of service of this notice, if service is by delivery, or 15 days from the date of service, if service is by mail, and if no objection is received from any party, the undersigned, on behalf of Plaintiff/Counter-Defendant Jeffrey Epstein, will issue the attached Subpoenas directed to the following, who are non-parties, to produce the items listed at the time and place specified in the Subpoenas:

1. Robert C. Joefsberg  
Podhurst Orseck, PA  
One S.E. Third Avenue, Suite 2700  
Miami, FL 33131
2. Charles Lichtman  
Berger Singerman  
300 East Las Olas Boulevard, Suite 1000  
Ft. Lauderdale, FL 33301
3. Spencer Kuvn  
1800 S. Australian Avenue, Suite 400  
West Palm Beach, FL 33409



4. Theodore Leopold  
Cohen Milstein  
2925 PGA Boulevard, Suite 200  
Palm Beach Gardens, FL 33410
5. Adam Horowitz  
425 N. Andrews Ave., Suite 2  
Ft. Lauderdale, FL 33301
6. Isidro M. Garcia  
Garcia Law Firm, P.A.  
224 Datura Street, Suite 900  
West Palm Beach, FL 33401
7. Earleen Cote  
Kubicki Draper  
One East Broward Boulevard, Suite 1600  
Fort Lauderdale, FL 33301
8. William Berger  
Weiss, Handler, Cornwell, P.A.  
2255 Glades Road, Suite 218A  
Boca Raton, FL 33431

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### **CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 13, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)

*Trial Counsel for Plaintiff/Counter-Defendant  
Jeffrey Epstein*

### **SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff Bradley J. Edwards</i></p>
--	---

Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i>	Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i>
Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	Fred Haddad Haddad & Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>
W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcblaw@aol.com">wcblaw@aol.com</a> <a href="mailto:wcblawasst@gmail.com">wcblawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>	Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i>

**TAB 1**

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Robert C. Josefsberg  
Podhurst Orseck, P.A.  
One S.E. Third Avenue, Suite 2700  
Miami, FL 33131

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at **9:00 a.m.** and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the**

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*

Copies provided to:

**SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcblaw@aol.com">wcblaw@aol.com</a> <a href="mailto:wcblawasst@gmail.com">wcblawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

**If you are a person with a disability who needs any accommodation in order to respond to this Subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Link & Rockenbach, 1555 Palm Beach Lakes Boulevard, Suite 301, West Palm Beach, Florida 33401 (561) 727-3600, at least seven days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven days; if you are hearing or voice impaired, call 711.**

NOT A CERTIFIED COPY



## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

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- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer,

server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document*’s terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Robert C. Josefsberg and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each request, the relevant time period shall be the period from January 1, 2008 to the present.

### ESI Instructions

3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.

- d. Where TIFF Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request Native Format files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.



21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

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**TAB 2**

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Charles Lichtman  
Berger Singerman  
300 East Las Olas Blvd., Suite 1000  
Ft. Lauderdale, FL 33301

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at **9:30 a.m.** and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the**

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*

Copies provided to:

**SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcblaw@aol.com">wcblaw@aol.com</a> <a href="mailto:wcblawasst@gmail.com">wcblawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

**If you are a person with a disability who needs any accommodation in order to respond to this Subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Link & Rockenbach, 1555 Palm Beach Lakes Boulevard, Suite 301, West Palm Beach, Florida 33401 (561) 727-3600, at least seven days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven days; if you are hearing or voice impaired, call 711.**

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## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

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5. The terms “*you*” or “*your*” mean Charles Lichtman and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

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- b. the past tense includes the present tense;
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2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

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**TAB 3**

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Spencer Kuvin  
1800 S. Australian Ave., Suite 400  
West Palm Beach, FL 33409

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 10:00 a.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the  
attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the

time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
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Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant  
Jeffrey Epstein*

Copies provided to:

## SERVICE LIST

<p>Jack Scarola  Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A.  2139 Palm Beach Lakes Boulevard  West Palm Beach, FL 33409  <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a>  <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a>  <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a>  <i>Co-Counsel for Defendant/Counter-Plaintiff</i>  Bradley J. Edwards</p>	<p>Nichole J. Segal  Burlington &amp; Rockenbach, P.A.  Courthouse Commons, Suite 350  444 West Railroad Avenue  West Palm Beach, FL 33401  <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a>  <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a>  <i>Co-Counsel for Defendant/Counter-Plaintiff</i>  Bradley J. Edwards</p>
<p>Bradley J. Edwards  Edwards Pottinger LLC  425 N. Andrews Avenue, Suite 2  Fort Lauderdale, FL 33301-3268  <a href="mailto:brad@epllc.com">brad@epllc.com</a>  <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a>  <i>Co-Counsel for Defendant/Counter-Plaintiff</i>  Bradley J. Edwards</p>	<p>Marc S. Nurik  Law Offices of Marc S. Nurik  One E. Broward Boulevard, Suite 700  Ft. Lauderdale, FL 33301  <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a>  <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman  315 S.E. Seventh Street, Suite 301  Ft. Lauderdale, FL 33301  <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a>  <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a>  <i>Co-Counsel for Plaintiff/Counter-Defendant</i>  Jeffrey Epstein</p>	<p>Fred Haddad  Haddad &amp; Navarro, PLLC  1 Financial Plaza, Suite 2612  Fort Lauderdale, FL 33394  <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a>  <i>Co-Counsel for Plaintiff/Counter-Defendant</i>  Jeffrey Epstein</p>
<p>W. Chester Brewer, Jr.  W. Chester Brewer, Jr. P.A.  250 Australian Avenue S., Suite 1400  West Palm Beach, FL 33401  <a href="mailto:wcblaw@aol.com">wcblaw@aol.com</a>  <a href="mailto:wcblawasst@gmail.com">wcblawasst@gmail.com</a>  <i>Co-Counsel for Plaintiff/Counter-Defendant</i>  Jeffrey Epstein</p>	<p>Jack A. Goldberger  Atterbury, Goldberger &amp; Weiss, P.A.  250 Australian Avenue S., Suite 1400  West Palm Beach, FL 33401  <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a>  <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a>  <i>Co-Counsel for Plaintiff/Counter-Defendant</i>  Jeffrey Epstein</p>

**If you are a person with a disability who needs any accommodation in order to respond to this Subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Link & Rockenbach, 1555 Palm Beach Lakes Boulevard, Suite 301, West Palm Beach, Florida 33401 (561) 727-3600, at least seven days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven days; if you are hearing or voice impaired, call 711.**

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## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer,

server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Spencer Kuvin and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each request, the relevant time period shall be the period from January 1, 2008 to the present.



### ESI Instructions

3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.

- d. Where TIFF Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request Native Format files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
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**TAB 4**

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Theodore Leopold  
Cohen Milstein  
2925 PGA Boulevard, Suite 200  
Palm Beach Gardens, FL 33410

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 10:30 a.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the**

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
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- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
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*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*



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<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcbllaw@aol.com">wcbllaw@aol.com</a> <a href="mailto:wcbllawasst@gmail.com">wcbllawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

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## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer,

server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Theodore Leopold and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

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## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

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3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.



- d. Where *TIFF* Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request *Native Format* files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

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# TAB 5

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Adam Horowitz  
425 N. Andrews Ave., Suite 2  
Ft. Lauderdale, FL 33301

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 11:00 a.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the  
attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the

time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant  
Jeffrey Epstein*

Copies provided to:

**SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcbllaw@aol.com">wcbllaw@aol.com</a> <a href="mailto:wcbllawasst@gmail.com">wcbllawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

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4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, *we* reserve the right to make a request for a file to be produced in color.

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- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request Native Format files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.



21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

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# TAB 6

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Isidro M. Garcia  
Garcia Law Firm, P.A.  
224 Datura Street, Suite 900  
West Palm Beach, FL 33401

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 11:30 a.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. **You may mail or deliver the copies to the**

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*

Copies provided to:

**SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcbllaw@aol.com">wcbllaw@aol.com</a> <a href="mailto:wcbllawasst@gmail.com">wcbllawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

**If you are a person with a disability who needs any accommodation in order to respond to this Subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Link & Rockenbach, 1555 Palm Beach Lakes Boulevard, Suite 301, West Palm Beach, Florida 33401 (561) 727-3600, at least seven days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven days; if you are hearing or voice impaired, call 711.**

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## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer,



server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Isidro M. Garcia and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each request, the relevant time period shall be the period from January 1, 2008 to the present.

### ESI Instructions

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4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

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9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
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# TAB 7

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: Earleen Cote  
Kubicki Draper  
One East Broward Blvd., Suite 1600  
Ft. Lauderdale, FL 33301

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 12:00 p.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. You may mail or deliver the copies to the

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

If you fail to:

- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
- (3) object to this Subpoena,

you may be in contempt of court. You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
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Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*

Copies provided to:

**SERVICE LIST**

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<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcbllaw@aol.com">wcbllaw@aol.com</a> <a href="mailto:wcbllawasst@gmail.com">wcbllawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

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## EXHIBIT A

### DEFINITIONS

1. “*Communication*” or “*communications*” mean any oral, written or electronic utterance, notation or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, any *documents*, correspondence, letters, facsimiles, e-mails, text messages, voice recordings, video recordings, voicemail, instant messages, conversations, dialogues, discussions, interviews, conferences, meetings, consultations, agreements, and other understandings or exchanges between or among two or more people.

2. “*Document*” or “*documents*” mean all paper documents, graphic or auditory records or representations, tangible items, and electronically stored information, and shall have the broadest possible meaning accorded to it consistent with Florida Rule of Civil Procedure 1.280 (which is incorporated in this definition as if fully set forth), and includes, by way of illustration only and not by way of limitation, the following items which are in *your* possession, control, knowledge, or are known to *you*:

- a. All written, paper or printed material of any kind, including, but not limited to: all transmittal slips, memoranda, notes, schedules, agendas, notices, books, brochures, calendars, employment files, announcements, meeting minutes, records of meetings, records of conversations, newsletters, telegrams, summaries, lists, compilations, facsimile transmissions, transcripts, diaries, appointment books, agreements, contracts, reports, studies, checks, check stubs, invoices, financial statements, bank statements, receipts, *communications*, interoffice and intraoffice exchanges, conversations, inquiries, replies, correspondence, and letters, whether in person, by telephone, in writing, or by means of any other transmittal

devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

- b. Graphic or auditory records or representations of any kind, including, but not limited to: all images, photographs, charts, drawings, sketches, diagrams, maps, schematics, microfiche, microfilm, slides, videotapes, laser discs, digital versatile discs, Blu-ray discs, UltraViolet discs, cassette tapes, reel to reel tapes, recordings, sound bites, motion pictures, voice messages, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing; and
- c. Electronically stored information, electronic, mechanical and electrical records or representations of any kind including, but not limited to: all electronic *communications*, text messages, e-mails, instant messages, computer logs, network logs, Internet history, document files, spreadsheet files, presentation files, database files, desktop publishing files, source code files, object code files, executable files, data files, script files, project management files, text files, portable document format files, tabulated data files, virtual machine files, XML files, webpage files, image files, design files, GIS files, system files, compressed files, disk image files, audio files, video files, backup files, metadata and all originals, reproductions, copies, changes, amendments, drafts, and all non-identical copies of the foregoing (defined herein as “*ESI*”; each individual electronically stored *document* is defined herein as an “*ESI document*”).

For purposes of the foregoing, *documents* may be located, stored or archived in any physical location or on any electronic storage media, including, without limitation, any computer,

server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean Earleen Cote and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under her control or on her behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each request, the relevant time period shall be the period from January 1, 2008 to the present.



### ESI Instructions

3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.

- d. Where *TIFF* Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request *Native Format* files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

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# TAB 8

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

---

**SUBPOENA DUCES TECUM WITHOUT DEPOSITION**  
**(Mail in Subpoena)**

THE STATE OF FLORIDA TO:

TO: William Berger  
Weiss, Handler, Cornwell, P.A.  
2255 Glades Road, Suite 218A  
Boca Raton, FL 33431

YOU ARE COMMANDED to appear at Link & Rockenbach, P.A., 1555 Palm Beach  
Lakes Boulevard, Suite 301, West Palm Beach, Florida, on \_\_\_\_\_, 2017, at 12:30 p.m. and to  
have with you at that time and place the following:

**SEE EXHIBIT A**

These items will be inspected and may be copied at that time. You will not be required to  
surrender the original items. You may comply with this Subpoena by providing legible copies of  
the items to be produced to the attorney whose name appears on this Subpoena on or before the  
scheduled date of production. You may condition the preparation of the copies upon the payment  
in advance of the reasonable cost of preparation. You may mail or deliver the copies to the

**attorney whose name appears on this Subpoena** and thereby eliminate your appearance at the time and place specified above. You have the right to object to the production pursuant to this Subpoena at any time before production by giving written notice to the attorney whose name appears on this Subpoena. THIS WILL NOT BE A DEPOSITION. NO TESTIMONY WILL BE TAKEN.

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- (1) appear as specified; or
- (2) furnish the records instead of appearing as provided above; or
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Dated: November \_\_, 2017.

LINK & ROCKENBACH, P.A.  
1555 Palm Beach Lakes Boulevard, Suite 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

[DRAFT]

By: \_\_\_\_\_  
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Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)  
*Trial Counsel for Plaintiff/Counter-Defendant*  
*Jeffrey Epstein*



Copies provided to:

**SERVICE LIST**

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:kbt@FLAppellateLaw.com">kbt@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 <a href="mailto:tonja@tonjahaddad.com">tonja@tonjahaddad.com</a> <a href="mailto:efiling@tonjahaddad.com">efiling@tonjahaddad.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Fred Haddad Haddad &amp; Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 <a href="mailto:dee@haddadandnavarrolaw.com">dee@haddadandnavarrolaw.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>
<p>W. Chester Brewer, Jr. W. Chester Brewer, Jr. P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:wcbaw@aol.com">wcbaw@aol.com</a> <a href="mailto:wcbawasst@gmail.com">wcbawasst@gmail.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>

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devices, and all originals, reproductions, copies, changes, amendments, drafts and all non-identical copies of the foregoing;

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server, appliance, cloud-based service, web-based service, database, internal hard drive, external hard drive, solid-state drive, hard or floppy diskette, compact disc, digital versatile disc, Blue-ray disc, UltraViolet disc, flash memory, flash card, thumb drive, cartridge, magnetic tape, mobile phone, tablet device, or personal digital assistant. Moreover, for purposes of the foregoing, the term “draft” means any earlier, preliminary, preparatory, or tentative version of all or part of a *document*, whether or not such draft was superseded by a later draft and whether or not the draft’s terms are the same as or different from the final *document’s* terms. Please note that “*Document*” and “*Documents*” as defined herein specifically include “*Communication*” and “*Communications*” as defined above.

3. “*Native Format*” means the file format of *ESI* in the application in which such *ESI* was originally created.

4. “*Person*” as used herein means any natural person or any entity, including, without limitation, any individual, public company, private company, firm, corporation, limited liability company, joint venture, trust, proprietorship, tenancy, association, partnership, business, agency, department, governmental body, bureau, board, commission, or any other form of public or private entity. With respect to an entity, *Person* shall include all subsidiaries and affiliates of the entity, as well as the present and former directors, officers, employees, attorneys, agents and anyone acting on behalf of, at the direction of, or under the control of, the entity or its subsidiaries or affiliates.

5. The terms “*you*” or “*your*” mean William Berger and include all employees, staff, representatives, attorneys, accountants, agents and any other person acting under his control or on his behalf.

6. “*Relates to*” or “*relating to*” mean authorizing, concerning, constituting, comprising, containing, consisting of, connected with, describing, disclosing, discussing,

evidencing, explaining, mentioning, pertaining to, proposing, reflecting, regarding, referring to, directly or indirectly, setting forth, showing, or summarizing.

7. “*Lawsuit*” means the litigation styled *Jeffrey Epstein v. Scott Rothstein and Bradley J. Edwards*, Case No. 502009CA040800XXXXMBAG, pending in the Fifteenth Judicial Circuit in and for Palm Beach County, Florida.

8. “*Other Lawsuits*” means all lawsuits filed by Jane Doe, L.M., E.W. or any other clients represented by Bradley J. Edwards against Jeffrey Epstein from January 1, 2008 to the present.

9. “*Tagged Image File Format*” or “*TIFF*” refer to the CCITT Group IV graphic file format for storing bit-mapped images.

10. Where appropriate:

- a. use of the singular includes the plural, and vice versa;
- b. the past tense includes the present tense;
- c. the words “and” and “or” are both conjunctive and disjunctive;
- d. the words “all” and “any” mean “any and all”;
- e. the word “including” means “including without limitation”; and
- f. use of the masculine includes the feminine, and vice versa.

## **INSTRUCTIONS**

### **General Instructions**

1. In response to this Subpoena Duces Tecum, you are required to furnish all information and documents which are, or have been, in your possession, custody, or control, or in your possession, custody, or control.

2. Unless otherwise specifically stated in each request, the relevant time period shall be the period from January 1, 2008 to the present.

### ESI Instructions

3. ESI Production Format. *ESI* shall be produced electronically, either in (1) *Native Format*, or (2) as single-page, uniquely and sequentially numbered Group IV *TIFF* image files. For each *ESI document*, all metadata must remain intact and all parent/child document relationships must be maintained. All *ESI* shall be collected using methods that prevent the spoliation of data.

4. Production Media. The production of *ESI* as described herein shall be made on an external hard drive, flash drive, CD or DVD ("*Production Media*"). The *Production Media* shall include a unique identifying label specifying: (a) *your* identity; (b) the date of the production of *ESI*; and (c) the Lawsuit name and number.

5. ESI of Limited Accessibility. If *you* contend that any *ESI document* responsive to this Subpoena is not reasonably accessible: (1) timely identify such *ESI document* with reasonable particularity; and (2) provide the basis for declining to produce the *ESI document*, including, for example, any limitations on access, the likely costs that might be incurred in accessing and producing the *ESI document*, the method used for storage of the *ESI document* and all locations in which the *ESI document* is kept.

6. TIFF Production. *ESI* produced as *TIFF* image files shall be produced as follows: (1) each production of *TIFF* image files shall be accompanied by a corresponding load file ("*Image Load File*"); (2) each *TIFF* image file must contain the same information and same physical representation as the *Native Format* file from which the *TIFF* image file was created; (3) each *TIFF* image file must not be less than 300 dpi resolution; (4) each *TIFF* image file shall be accompanied by an extracted text file containing the extracted text of the *Native Format* file from which the *TIFF* image file was created; (5) each extracted text file shall be named to match the endorsed number assigned to the first page of each corresponding *TIFF* image file; (6) the

extracted text files shall be accompanied by a Control List File (“*LST*”); (7) each production of *TIFF* image files shall be accompanied by an image cross-reference load file, such as Opticon (“*OPT*”), which shall provide the beginning and ending endorsed number of each *TIFF* image file and the number of pages it includes; and (8) each production of *TIFF* image files must be accompanied by a data load file (“*Data Load File*” or “*DAT*”) that contains both the hash value and all available metadata of the *Native Format* files from which the *TIFF* image files were created. Further, the following instructions apply to the production of *TIFF* image files:

- a. Processing Specifications. For each *Native Format* file that is converted to *TIFF* format: (1) all tracked changes shall be maintained so that all changes are visible; (2) OLE Embedded files shall not be extracted as separate *documents*; (3) author comments shall remain or be made visible; (4) hidden columns, cells, rows, worksheets and other hidden data shall remain or be made visible; (5) presenter notes shall remain or be made visible; and (6) to the extent *ESI* in a foreign language is produced, processing of such *ESI* shall be unicode-compliant.
- b. Document Unitization. If a *Native Format* file that is converted to *TIFF* format is more than one page, the unitization of the file and any attachments or affixed notes must be maintained as it existed when collected. If unitization cannot be maintained, the original unitization must be documented in the *Data Load File* or otherwise electronically tracked.
- c. Color. If a *Native Format* file that is converted to *TIFF* format contains color, the *TIFF* image file need not be produced in color. However, we reserve the right to make a request for a file to be produced in color.



- d. Where *TIFF* Image File Format is Impracticable. In the event that production of a *Native Format* file as a *TIFF* image would be impracticable, you shall produce such file in *Native Format* with all metadata intact. You shall provide a single page *TIFF* image placeholder referencing the title of the *Native Format* file not being produced as a *TIFF* image.
- e. Spreadsheets. All Microsoft Excel files, similar non-Microsoft spreadsheet files, and graphical compilations of spreadsheet data, shall be produced in *Native Format* with all cells, columns, rows and worksheets and other information unhidden and expanded.
- f. Right to Request *Native Format* files. We reserve the right to demand production in *Native Format* of any file produced by you as a *TIFF* image file.

#### **REQUESTED DOCUMENTS**

1. Your current curriculum vitae.
2. Any reports prepared by you or at your direction, relating to your services or participation in this Lawsuit and your analysis of the Other Lawsuits.
3. Copies of any notes made by you, or provided to you, relating to your opinions or conclusions in this Lawsuit and your analysis of the Other Lawsuits, whether you relied on those notes or not.
4. Communications between you and any person relating to your analysis, opinions or conclusions in this Lawsuit, as well as your analysis of the Other Lawsuits.
5. Any photographs or videos taken by you, or provided to you, that you have observed and reviewed in relation to this Lawsuit.
6. Any deposition or hearing transcripts provided to you, or parts of deposition transcripts or any other statements or written materials provided to you, which you have examined or will examine in relation to this Lawsuit.
7. Any diagrams or drawings made by you or provided to you, which you have examined in relation to this Lawsuit.

8. Any statements or affidavits taken by you, at your direction, or provided to you for your review concerning any of the facts which are involved in this Lawsuit.
9. Any memoranda or written notice made by you, or provided to you, concerning the subject matter of this Lawsuit.
10. Any documents prepared by you, provided to you, or obtained by you or reviewed by you, whether intended for your use or not, and regardless of whether or not you actually reviewed or relied on those documents, in connection with this Lawsuit.
11. All literature and/or documents that you considered relevant to your assignment in this Lawsuit and which you considered in the development of your opinions or conclusions concerning the subject matter of the lawsuit.
12. All documents prepared by you to illustrate or demonstrate any fact or opinion considered relevant to this Lawsuit and/or to your assignment, investigation, or opinions.
13. Copies of any articles, books, papers or other publications prepared by you which relate to facts similar to the facts surrounding the subject matter of this Lawsuit.
14. Any and all materials considered, consulted, and used by you as a basis or predicate for your opinions and conclusions in this Lawsuit, including, but not limited to, published reports by any private or government agency, textbooks, articles, data or documents furnished by the party engaging your services, or government or industry standards or regulations.
15. Any and all models or demonstrative tools upon which you have or plan to rely, in the formulation and expression of your opinions and conclusions concerning the subject matter of this Lawsuit.
16. A copy of any retainer agreement or other agreement between you and Bradley James Edwards (or counsel for Bradley James Edwards) that sets forth the terms of your engagement in this matter, including, but not limited to, the fees for your services in this Matter.
17. A copy of all statements, bills, invoices, check stubs or any other document that reflects payment or compensation, or a request for payment or compensation, for your services in this Lawsuit or any of the Other Lawsuits.
18. All marketing materials that market or advertise your expert witness services.
19. A list of all other expert witness services performed for Bradley James Edwards, or any clients represented by Bradley James Edwards, in the last ten years.
20. A list of other depositions or trials in which you have testified from January 1, 2008 to the present.

21. All expert reports, testimony, videos and affidavits in which you have testified as an expert on any issue in the last ten years.
22. Copies of all publications, expert reports, depositions or other documents in which you have discussed, analyzed or otherwise referenced the subject of the scope of discovery in litigation.
23. Your file regarding your opinions, possible opinions, expert testimony, and/or consultation relating directly or indirectly to the issues in this Lawsuit.
24. All complaints filed against you with the Florida Bar, as well as all communications to you by the Florida Bar and all documents relating to any disciplinary proceedings or investigations conducted by the Florida Bar, or any committee of the Florida Bar.

NOT A CERTIFIED COPY

# EXHIBIT D

NOT A CERTIFIED COPY

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

\_\_\_\_\_ /

**SEVENTH AMENDED AND SUPPLEMENTAL WITNESS LIST**  
**OF COUNTER-PLAINTIFF BRADLEY J. EDWARDS**

Counter-Plaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys,  
hereby supplements his list of witnesses for trial as follows:

**WITNESSES EXPECTED TO BE PRESENTED**

1. Bradley J. Edwards
- 2.. Jeffrey Epstein
3. Sarah Vickers (formerly Kellen)  
c/o John Stephenson  
1201 W. Peachtree Street  
Atlanta, Georgia 30339
4. Nadia Marcinkova  
c/o Erica Dubno  
767 Third Avenue, Suite 3600  
New York, New York 10017
5. Virginia Roberts Guiffre  
c/o Stan Pottinger  
49 Twin Lakes Road, Suite 100  
South Salem NY 10590

6. Maria Farmer  
c/o Peter Guirguis, Esq.  
Mintz & Gold LLP  
600 Third Avenue, 25<sup>th</sup> Floor,  
New York 10016
7. Annie Farmer  
c/o Peter Guirguis, Esq.  
Mintz & Gold LLP  
600 Third Avenue, 25<sup>th</sup> Floor,  
New York, 10016
8. Nadia Bjorlin  
13701 Riverside Drive, Suite 800  
Sherman Oaks, CA 91423-2449
9. Alexandra Hall  
c/o Robert C. Josefsberg, Esq.  
Podhurst Orseck, PA  
One S.E. 3<sup>rd</sup> Avenue, Suite 2700  
Miami, FL 33131
10. Robert C. Josefsberg, Esquire  
Podhurst Orseck, PA  
One S.E. 3<sup>rd</sup> Avenue, Suite 2700  
Miami, FL 33131
11. Detective Joseph Recarey  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
12. Chief Michael Reiter  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
13. John Connolly  
c/o Simon & Schuster  
1230 6th Avenue  
New York, New York 10020

14. Charles Lichtman, Esquire  
Berger Singerman  
300 East Las Olas Boulevard, Suite 1000  
Fort Lauderdale, FL 33301
15. Courtney Wild  
c/o Adam Horowitz.  
Horowitz Law  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale FL 33301
16. Antonio Figueroa (Tony)  
Palm Coast, Florida
17. Records Custodian of Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
18. Records Custodian of United States Attorney's Office  
for the Southern District of Florida
19. Records Custodian of the Federal Bureau of Investigations
20. Spencer Kuvn, Esquire  
1800 S. Australian Avenue, #400  
West Palm Beach, Florida 33409
21. Theodore Leopold, Esquire  
Cohen Milstein  
2925 PGA Boulevard, Suite 200  
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22. Rinaldo Rizzo  
c/o Robert Lewis  
228 East 45th Street | 17th Floor  
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23. Adam Horowitz, Esquire  
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24. Isidro M. Garcia, Esquire  
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25. Earleen Cote, Esquire  
Kubicki Draper  
One East Broward Boulevard, Suite 1600  
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26. Bernard J. Jansen, Ph.D.  
c/o Jack Scarola  
Searcy Denney Scarola Barnhart & Shipley  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409
27. William Berger, Esquire  
Weiss, Handler, Cornwell, P.A.  
2255 Glades Road, Suite 218A  
Boca Raton, FL 33431

**WITNESSES WHICH MAY BE CALLED IF THE NEED ARISES**

28. Adriana Mucinska  
1040 South Shore Drive  
Miami Beach, FL 33141
29. Landon Thomas  
c/o New York Times  
620 Eighth Avenue  
New York, NY 10018
30. Oren Kramer  
c/o Boston Provident, L.P.  
717 5th Avenue #12A  
New York, NY 10022
31. Lawrence LaVecchio  
United States Attorney's Office, Southern District of Florida  
Broward Financial Center  
Fort Lauderdale, Florida



32. Amanda Laszlo  
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42. Paul Cassell, Esq.  
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45. Felicia Esposito Cartwright  
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46. Jennifer Amenold  
c/o Robert C. Josefsberg, Esq.  
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Miami, FL 33131
47. Jennifer Pitts Catino  
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Miami, FL 33131

48. Prince Andrew Albert Christian Edwards  
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49. Frederic Fekkai  
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51. Lesley Groff  
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53. Lauren Murphy  
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54. Leigh Skye Patrick  
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55. Meagan Dorshel  
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60. Sabrina Ewart  
c/o Robert C. Josefsberg, Esq.  
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61. Saige Gonzales  
c/o Spencer Kuvn  
1800 South Australian Ave #400  
West Palm Beach, Florida, 33409
62. ✓ Johanna Sjoberg  
c/o Marshall Dore Louis  
40 NW third Street, Suite 200  
Miami, FL 33128
63. Jason Richards  
Federal Bureau of Investigation  
16320 NW 2<sup>nd</sup> AVE., Miami, FL 33169

64. Shawna Rivera  
c/o Bradley Edwards, Esq.  
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65. Tatum Miller  
c/o Bradley Edwards, Esq.  
Edwards Pottinger LLC  
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66. Vanessa Zalis  
c/o Adam Horowitz.  
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67. Virginia Alvarez  
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68. Yolanda Lopez  
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69. Nezbitt Kurkendall  
Federal Bureau of Investigation  
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70. Daynia Nida  
c/o Isidro M. Garcia  
Garcia Law Firm, P.A.  
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71. Igor Zinoviev  
Address Currently Unknown
72. Pralaya Cuomo  
Address Currently Unknown
73. Svetlana Pozhidaeva  
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74. Seth Lehrman  
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75. Matt Weissing  
425 North Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301
76. Maria Villafana  
500 S. Australian Avenue, #400  
West Palm Beach, FL 33401
77. Any additional individuals identified as victims by the United States Attorney's  
Office and whose identities were conveyed to Jeffrey Epstein as part of a list  
supplied as it related to the NPA.
78. Leslie Wexner  
Three Limited Parkway  
Columbus, Ohio 43206
79. President Donald J. Trump  
c/o Alan Garten, Esq.  
725 Fifth Avenue  
New York, NY 10022
80. Larry Visoski  
1131 Pine Point Road  
Riviera Beach, FL 33401
81. Maritza Vasquez  
1293 SW 21<sup>st</sup> Terrace  
Miami, FL 33145

82. Maximilia Cordero  
c/o William Unroch, Esquire  
140 West End, Apt. 30-BW  
New York, NY 10023
83. Brittany Beale  
c/o Spencer Kuvin  
1800 S. Australian Avenue, #400  
West Palm Beach, Florida 33409
84. Melissa Eaton  
2915 Share Rd. 111  
Tallahassee, FL 31312
85. Danielle Hendrick Dicenso  
c/o Robert C. Josefsberg, Esq.  
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86. David Copperfield (David Seth Kokin)  
11675 Glowing Sunset Lane  
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87. Haley Robson  
12247 72ND CT N  
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88. Michael Fisten  
Weston, FL
89. Russell Adler  
Delray Beach, FL
90. Marie Alessi  
6791 Fairway Lakes Dr.  
Boynton Beach, FL 33472
91. Janusz Banasiak  
358 El Brillo Way  
Palm Beach, FL, 33480

92. Beata Banasiak  
358 El Brillo Way  
Palm Beach, FL, 33480
93. Juan Alessi  
6791 Fairway Lakes Dr.  
Boynton Beach, FL 33472
94. Michael Friedman  
53320 Avenida Madero  
La Quinta, CA 92253
95. Jerry Goldsmith  
13285 Silver Fox Lane  
West Palm Beach, FL 33418-7942
96. Rosalie Freedman  
53320 Avenida Madero  
La Quinta, CA 92253
97. Valdson Cotrin  
Address Currently Unknown
98. Dana Burns  
301 East 66TH Street, Apt. 11P  
New York, NY 10065
99. Cecelia Stein  
Unknown, South Africa
100. Glenn Dubin  
1040 5th Ave. Unit 15A  
New York, NY 10028-0137
101. Abigail Wexner  
Three Limited Parkway  
Columbus, Ohio 43206
102. Officer Munyan  
Palm Beach Police Department  
345 South County Road



Palm Beach, FL 33480

103. Officer Minot  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
104. Sgt. Sorge  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
105. Christina Venero  
Address Currently Unknown
106. Joseph Pagnano  
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107. Stephan Kosslyn  
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Cambridge, MA 02138-1802
108. Cecile Dejongh  
23 8 Estate Mafolie  
St. Thomas VI 00802
109. Tommy Mottola  
302 Caribbean Road  
Palm Beach, FL 33480-3012
110. Mike Sanka  
449 S Beverly Drive, Suite 101  
Beverly Hills, CA 90212
111. Cecilia Steen  
S/A Witness #108
112. William "Bill" Riley  
5645 Coral Ridge Drive # 391  
Coral Springs, FL 33076

113. Howard Rubenstein  
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New York, NY 10105
114. Robert Meister  
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Palm Beach, FL 33480
115. Todd Meister  
101 Seminole Ave  
Palm Beach, FL 33480
116. President William J. Clinton
117. William Hammond  
2965 Fontana Place  
Royal Palm Beach, FL
118. Robert Roxburgh  
5600 North Flagler Dr, #250  
West Palm Beach, Florida
119. Michele Pagan  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
120. Michele Dawson  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480
121. Amy Fortimer  
12309 North Old Country Road  
Wellington, FL 33414
122. Anna Skidan  
545 East 5<sup>th</sup> Street, Apt. 6E  
New York, NY 10009

123. Christina Venero  
971 NW Fresco Way, Apt. 208  
Jensen Beach, FL 34957
124. Dara Gehringer (Dara Preece)  
3139 Kingston Court,  
West Palm Beach, Florida
125. Juliana Barbosa  
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Miami, FL 33133-2607
126. Latasha Lowe  
c/o Adam Horowitz.  
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127. Melissa Hanes  
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West Palm Beach, Florida
128. Zack Bryan  
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129. Zinta Braukis  
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130. Larry Morrison  
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131. Story Cowles  
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132. Michael Dawson  
Palm Beach Police Department  
345 South County Road  
Palm Beach, FL 33480

133. Salaam Kahlid Monroe  
119 Menores Ave., Apt. 3  
Coral Gables, FL 33134
134. Jelitza Negrette  
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Portland, ME 04101
135. Sergia Cordero  
825 Brickell Bay Drive, #1141  
Miami, FL 33131
136. Cassandra Rivera  
5011 El Claro Circle  
West Palm Beach, FL 33415
137. Randee Speciale  
Palm Beach Victim Services  
205 North Dixie Highway, #5.1100  
West Palm Beach, FL 33401
138. Nicole Hesse  
Address Currently Unknown
139. Steven Hoffenberg  
Address Currently Unknown
140. Michael Stroll  
Address Currently Unknown
141. Douglas Shoettle  
243 Riverside, Dr.  
New York, NY 10025
142. Ghislaine Maxwell  
Address Currently Unknown
143. Amazon Records Custodian
144. Yellow Cab Records Custodian

145. Citrix Systems, Inc. Records Custodian
146. Federal Bureau of Investigation Records Custodian
147. Milton Girls Juvenile Facility Records Custodian  
5770 East Milton Road  
Milton, FL
148. School District of Palm Beach County Records Custodian  
3344 Forest Hill Blvd., Suite C-124  
West Palm Beach, FL 33406
149. St. Mary's Medical Center Records Custodian  
901 45<sup>th</sup> Street  
West Palm Beach, FL 33401
150. Wellington Reginal Hospital Records Custodian  
10104 Forrest Hill Blvd.  
Wellington, FL 33414
151. All witnesses that Defendants have listed on their Witness List not objected to by Plaintiff.
152. All rebuttal witnesses.
153. All People on Jeffrey Epstein's Inmate Visitor Log while he was in jail.

**WITNESS TESTIMONY EXPECTED TO BE PRESENTED**  
**BY MEANS OF DEPOSITION**

154. Mark Epstein  
30 Vandam Street  
New York, NY 10013
155. Adriana Ross (Adriana Mucinska)  
c/o Alan S. Ross, Esq.
156. Louella Rabuyo  
358 El Brillo Way  
Palm Beach, FL 33480
157. Alfredo Rodriguez

c/o Federal Public Defender or Bureau of Prisons  
11349 SW 86TH Lane  
Miami, FL

158. Scott Rothstein  
c/o Mark Nurik  
One East Broward Boulevard, Suite 700  
Fort Lauderdale, Florida 33301

159. Jeffrey Epstein

160. Courtney Wild  
c/o Adam Horowitz.  
Horowitz Law  
425 North Andrews Avenue, Suite 2  
Fort Lauderdale FL 33301

**EXPERT WITNESSES**

161. Bernard J. Jansen, Ph.D.  
c/o Jack Scarola  
Searcy Denney Scarola Barnhart & Shipley  
2139 Palm Beach Lakes Blvd.  
West Palm Beach, FL 33409

The following witnesses are attorneys that are not retained or specially employed to provide expert testimony, but may provide opinions relating to the propriety of Brad Edward's conduct of discovery in the prosecution of the Epstein claims.

162. Robert C. Josefsberg, Esquire  
Podhurst Orseck, PA  
One S.E. 3<sup>rd</sup> Avenue, Suite 2700  
Miami, FL 33131

163. Charles Lichtman, Esquire  
Berger Singerman  
300 East Las Olas Boulevard, Suite 1000  
Ft. Lauderdale, FL 33301

164. Spencer Kuvn, Esquire  
1800 S. Australian Avenue, #400  
West Palm Beach, Florida 33409
165. Theodore Leopold, Esquire  
Cohen Milstein  
2925 PGA Boulevard, Suite 200  
Palm Beach Gardens, Florida 33410
166. Adam Horowitz, Esquire  
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Ft. Lauderdale, FL 33301
167. Isidro M. Garcia, Esquire  
Garcia Law Firm, P.A.  
224 Datura Street, Suite 900  
West Palm Beach, FL, 33401
168. Earleen Cote, Esquire  
Kubicki Draper  
One East Broward Boulevard, Suite 1600  
Fort Lauderdale, FL 33301
169. William Berger, Esquire  
Weiss, Handler, Cornwell, P.A.  
2255 Glades Road, Suite 218A  
Boca Raton, FL 33431

Plaintiff reserves the right to amend this list.


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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 9<sup>th</sup> day of November, 2017.



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Attorneys for Bradley J. Edwards



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