

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'S OBJECTIONS TO DEFENDANT/
COUNTER-PLAINTIFF'S AMENDED EXHIBIT LIST**

Plaintiff/Counter-Defendant, Jeffrey Epstein, files the following Objections to
Defendant/Counter-Plaintiff, Bradley J. Edwards' Amended Exhibit List dated November 9, 2017:

LEGEND FOR OBJECTIONS:

- 1 – All Objections
- 2 – All Objections except Authenticity
- 3 - Relevance
- 4 – Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence
- 5 – Privileged
- 6 - Opinion
- 7 – Hearsay
- 8 – Authenticity
- 9 – Other (please identify basis of objection)
- 10 – Completeness
- 11 – Overbroad
- 12 – Not provided to Counsel for Epstein Prior to Filing Pretrial Stipulation
- 13 – Not a proper exhibit
- 14 – Trade secrets/Confidential

No.	Edwards' Exhibit Description	Epstein's Objections
1.	All applicable criminal statutes	3, 4, 7, 11, 12
2.	All applicable Florida Statutes	3, 4, 7, 11, 12
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12
4.	Order confirmation from <u>Amazon.com</u> for purchase of books "SM 101: A realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"	3, 4, 7, 8
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10
6.	Jane Doe 102 Complaint	3, 4, 7, 13
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11 14
12.	Jail Visitation Logs	3, 4, 7, 8, 11
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8
16.	Video of Search Warrant of Jeffrey Epstein's home being executed	3, 4, 8
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8, Cannot be read
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets	12
20.	Jeffrey Epstein's passport (or copy)	12
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12

No.	Edwards' Exhibit Description	Epstein's Objections
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home	3, 4, 7, 8, 10,
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation	3, 4, 7, 8, 10, 11, 14
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12
32.	List of properties and vehicles in Larry Visoski's name	3, 4, 7, 8, 11, 13, The exhibit provided was an entire Motion (which was denied) not just the identified item.
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13
36.	All Complaints in which Jeffrey Epstein is/was a plaintiff or defendant	3, 4, 11, 12, 13. This also includes a motion which is not part of the stated exhibit.
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB	3, 4, 11, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG	3, 4, 11, 12, 13
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10
46.	Victim Notification Letter from US Attorney's Office to Victim	3, 4, 7, 8, 14
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8,
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant	3, 4, 7, 8, 12
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13
59.	Massage Table	3, 4, 12 (document marked as No. 59 is not a massage table)
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13

No.	Edwards' Exhibit Description	Epstein's Objections
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8
69.	List of planes owned by Jeffrey Epstein	3, 4, 7, 8, 12 (document provided does not match description), 14
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13
77.	Documents related to the rental of a vehicle for Vanessa Zalis	3, 4, 7, 8, document produced contains other items not identified on list
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11
91.	Jeffrey Epstein notepad notes.maria	3, 4, 7, 8, 10, 12
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10
96.	Victim's school records and transcripts	3, 4, 7, 8
97.	Victim Notification letter dated 7-9-08	3, 4, 7, 8
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12
102.	All items listed on the Palm Beach Police Property Report Lists	3, 4, 7, 8, 12 (items not provided)
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,

No.	Edwards' Exhibit Description	Epstein's Objections
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto	3, 4, 7, 8, 12, 13
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause	3, 4, 7, 8, 12, 13
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits	12
109.	Edwards' reserves all objections to Epstein's Exhibits	Not an exhibit
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.	3, 4, 7, 8, 12, 13
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez	3, 4, 7, 8, 11, 14 (duplicative of Exhibit No. 8)
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45

No.	Edwards' Exhibit Description	Epstein's Objections
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009	
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013	3, 4, 7, 13
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012	
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8
133.	Any and all responses to Subpoenas Duces Tecum with or without deposition	3, 4, 6, 7, 8, 10, 11, 12 (document produced not reflective of the description), 13, 14
134.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12 (document produced not reflective of the description), 13
135.	Any and all documents produced in this action.	12
136.	Any and all depositions taken in this action.	12 (document provided is not reflective of description), 13
137.	Any documents or other exhibit attached to or used during any deposition in this action	12 (document provided is not reflective of description), 13
138.	Any and all exhibits, documents, etc. referred to in any deposition	12 (document provided is not reflective of description), 13
139.	Any and all documents and exhibits designated by all parties to this action.	12 (document provided is not reflective of description), 13
140.	Any and all exhibits needed for impeachment or rebuttal	12 (document provided is not reflective of description)

No.	Edwards' Exhibit Description	Epstein's Objections
141.	Any and all pleadings filed in this action	12 (document provided is not reflective of description), 13
142.	Any and all records produced or that will be produced by all records custodians relative to this action	12 (document provided is not reflective of description), 13

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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