

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'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  |

| <b>No.</b> | <b>Edwards' Exhibit Description</b>  | <b>Epstein's Objections</b>  |
|------------|--|--|
| 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   |

| <b>No.</b> | <b>Edwards' Exhibit Description</b>  | <b>Epstein's Objections</b>                                 |
|------------|--|---|
| 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  |

| <b>No.</b> | <b>Edwards' Exhibit Description</b>                                    | <b>Epstein's Objections</b>   |
|------------|--|---|
| 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  |

| <b>No.</b> | <b>Edwards' Exhibit Description</b>   | <b>Epstein's Objections</b>  |
|------------|---|--|
| 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 <sup>th</sup> 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<br>(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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*Trial Counsel for Plaintiff/Counter-Defendant  
Jeffrey Epstein*

### SERVICE LIST

|   |  |
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