

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,

Defendants.

**RESPONSE IN OPPOSITION TO EPSTEIN'S MOTION IN LIMINE ON EDWARDS'
NEWLY DISCLOSED TRIAL EXHIBITS AND TO EXCLUDE DEPOSITION
TESTIMONY OF WITNESSES WHO WERE NOT DEPOSED IN THIS MATTER**

Counter-Plaintiff, Bradley J. Edwards, by and through undersigned counsel, hereby files this Response in Opposition to Epstein's Motion in Limine on Edwards' Newly Disclosed Trial Exhibits and to Exclude Deposition Testimony of Witnesses Who Were Not Deposed in this Matter, and as grounds therefore states as follows:

1. Epstein's motion is misleading and is nothing more than a pointless attempt to make a mountain out of a mole hill. Pursuant to the Court's July 20, 2017 Pre-Trial Order, Edwards timely produced copies of all 79 trial exhibits that Epstein's motion seeks to categorically exclude. These exhibits were produced along with 130+ additional exhibits in November of 2017.

2. Immediately after the December 7, 2017 hearing in this case, undersigned counsel's office realized that, through oversight, its November 3, 2017 Amended Exhibit List was the wrong version of that pleading because it inadvertently left off the descriptions of 79 exhibits that had already been produced to defense counsel. So, although the filed exhibit list needed to be corrected,

Edwards adv. Epstein

Response in Opposition to Epstein's Motion in Limine as to Newly Filed Exhibits

Case No.: 502009CA040800XXXXMBAG

COUNSEL LIST

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Edwards adv. Epstein

Response in Opposition to Epstein's Motion in Limine as to Newly Filed Exhibits

Case No.: 502009CA040800XXXXMBAG

Fax: (954)-745-3556

Attorneys for Scott Rothstein

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
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Case No. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY EDWARDS, individually,

Defendants/Counter-Plaintiff.

VOLUME I

TRANSCRIPT OF PROCEEDINGS

DATE TAKEN: Tuesday, December 5th, 2017
TIME: 10:02 a.m. - 4:35 p.m.
PLACE 205 N. Dixie Highway, Room 10C
West Palm Beach, Florida
BEFORE: Donald Hafele, Presiding Judge

This cause came on to be heard at the time and place
aforesaid, when and where the following proceedings were
reported by:

Sonja D. Hall
Palm Beach Reporting Service, Inc.
1665 Palm Beach Lakes Boulevard, Suite 1001
West Palm Beach, FL 33401
(561) 471-2995

1 is the video of the search warrant of my
2 client's home -- while being executed, the
3 search. I don't have the video, but I
4 presume by that -- it wasn't produced, but I
5 presume by that description, it is the same
6 ruling.

7 THE COURT: The same ruling as in 17,
8 the application for the search warrant is
9 sustained.

10 MR. SCAROLA: Let me just point out to
11 Your Honor that the reason why that's listed
12 is because the victims, including these
13 three, give detailed descriptions of where
14 they were in the house and what the interior
15 looked like. And all of that is
16 corroborated by the search warrant video.

17 THE COURT: Again, it's with the
18 proviso and caveat that I will re-examine
19 each of these exhibits, if need be, when the
20 context is pointed out. But for now, the
21 same ruling is being issued.

22 MS. ROCKENBACH: Number 18 -- actually,
23 17. It's identified on the exhibit list by
24 Mr. Edwards as the application for a search
25 warrant of my client's home. And it's

1 possible that by mistake Mr. Scarola's
2 office produced a different document,
3 because what was produced in this context
4 was an order sealing affidavit and
5 application for search warrant and related
6 search warrant and inventory in return. And
7 attached to that were the subpoenas to the
8 custodian of records for BellSouth, T-Mobile
9 and Cingular. So it looks like phone
10 records.

11 MR. SCAROLA: Sounds like the wrong
12 exhibit.

13 MS. ROCKENBACH: Sounds like the wrong
14 exhibit, but we would object to -- on the
15 same basis that the application for the
16 search warrant of Mr. Epstein's home would
17 not be relevant, would be prejudicial --

18 THE COURT: I have already indicated
19 the same as to number 17.

20 MS. ROCKENBACH: Eighteen, Your Honor,
21 is the complaint.

22 THE COURT: That, again, is typically a
23 matter of judicial notice, so we will deal
24 with it, if we need to, at a later time.

25 "All records of homes, properties, bank

Chris R. Rodgers

From: Chris R. Rodgers
Sent: December 20, 2017 3:59 PM
To: Scott J. Link
Subject: RE: Regarding: Edwards, Bradley adv. Epstein (File #: 291874)

CaseID: 10201635
CategoryID: 0
IntakeCase: 0
SentFromSession: CRODGERSW10.crodgers.12/20/2017 2:49:09 PM

Thank you.

From: Scott J. Link [mailto:Scott@linkrocklaw.com]
Sent: December 20, 2017 3:58 PM
To: Chris R. Rodgers <crodgers@SearcyLaw.com>
Cc: Tina L. Campbell <Tina@linkrocklaw.com>; Jack Scarola <JSX@SearcyLaw.com>; David P. Vitale Jr. <dvitale@searcylaw.com>; Kimberly Marsh <kmarsch@searcylaw.com>; Mary McCann <mmccann@Searcylaw.com>; Kara Berard Rockenbach <Kara@linkrocklaw.com>
Subject: Re: Regarding: Edwards, Bradley adv. Epstein (File #: 291874)

Of course. Scott

Scott J. Link
Board Certified Business Litigation

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Blvd., Suite 301
West Palm Beach, FL 33401
office (561) 727-3600 | fax (561) 727-3601 | Email: scott@linkrocklaw.com



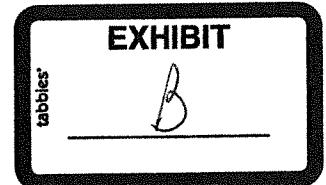
This e-mail may contain privileged or confidential information. If it is not meant for you, please delete it and notify us immediately. Please

confirm receipt of time sensitive communications because email deliveries may be delayed or unsuccessful. We do not provide tax advice. Our communications may not be relied upon to avoid penalties that may be imposed by the Internal Revenue Service.

On Dec 20, 2017, at 3:57 PM, Chris R. Rodgers <crodgers@SearcyLaw.com> wrote:

Hey Tina,

We are having data download speed issues with some of our exhibits. While we hope to get you these exhibits by the end of today, our fear is that the download delay might take longer



than expected (*actually, it already has*). Given that, and in an abundance of caution, would you be willing to extend to us a one day extension to provide you with the missing Edwards exhibits?

Thank you for your understanding with this matter,

Chris Rodgers

From: Chris R. Rodgers
Sent: December 7, 2017 8:47 AM
To: 'Tina L. Campbell' <Tina@linkrocklaw.com>
Cc: Jack Scarola <JSX@searcylaw.com>; David P. Vitale Jr. <dvitale@searcylaw.com>; Kimberly Marsh <kmarsh@searcylaw.com>; Mary McCann <mmccann@Searcylaw.com>; Scott J. Link <Scott@linkrocklaw.com>; Kara Berard Rockenbach <Kara@linkrocklaw.com>
Subject: Regarding: Edwards, Bradley adv. Epstein (File #: 291874)

Good Morning Tina,

Yesterday it was discovered that we inadvertently attached an incorrect version of our Exhibit List to our Unilateral Pre-Trial Stipulation which was filed on November 15, 2017. While the exhibit list provided in this filing was incorrect, the actual exhibit documents forwarded to you on November 9, 2017 were correct. As an example, the 11/09/17 provided exhibits go to number 207, while the 11/15/17 Exhibit List stops at number 142. You will notice that the correct Exhibit List (*attached*) corresponds correctly to the provided exhibits. To correct this error, we are filing this correct Exhibit List today – as our Second Amended Exhibit List. Please e-mail or call with any concerns, or questions, regarding this correction.

<image001.jpg> www.searcylaw.com

Chris R. Rodgers Senior Litigation Paralegal/Investigator	<image002.png>
crodgers@searcylaw.com P: (561) 686-6300 ext. 145 F: (561) 383-9451 Searcy Denney Scarola Barnhart & Shipley P.A. 2139 Palm Beach Lakes Blvd. West Palm Beach, FL 33409	

***** | Privileged and Confidential | Electronic communication is not a secure mode of communication and may be accessed by unauthorized persons. This communication originates from the law firm of Searcy Denney Scarola Barnhart & Shipley, P.A. and is protected under the Electronic Communication Privacy Act, 18 U.S.C. S2510-2521. The information contained in this E-mail message is privileged and confidential under Fla. R. Jud. Admin. 2.420 and information intended only for the use of the individual(s) named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution, or copy of this communication is strictly prohibited. Personal messages express views solely of the sender and shall not be attributed to the law firm. If you received this communication in error, please notify the sender immediately by e-mail or by telephone at (800) 780-8607 and destroy all copies of the original message. Thank you.

IN THE CIRCUIT COURT OF THE
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JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

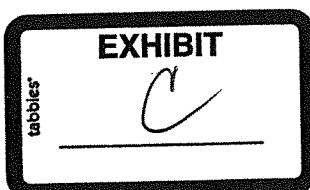
Defendants/Counter-Plaintiff.

**ORDER ON PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
REVISED OMNIBUS MOTION IN LIMINE
SECTION B (EDWARDS' TRIAL EXHIBITS)**

THIS MATTER came before the Court for hearing on November 29, 2017, and December 5, 2017, upon Section B (Edwards' Trial Exhibit List¹) of the Revised Omnibus Motion in Limine filed by Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") (D.E. 1070). The Court, having reviewed the Motion and the Response filed by Defendant/Counter-Plaintiff Bradley J. Edwards ("Edwards") (D.E. 1089), having heard argument of counsel, and being otherwise fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that:

¹ Epstein's Revised Omnibus Motion in Limine was directed at Edwards' Amended Exhibit List dated November 9, 2017. (D.E. 1043.) On December 7, 2017, after two days of hearing and substantive Court rulings, Edwards filed a Second Amended Exhibit List (D.E. 1109) identifying 79 new items and modifying some of his earlier disclosed exhibits. This Order only addresses the exhibits identified on Edwards' November 9, 2017, Exhibit List. To the extent any exhibit numbers have been replaced with different items or new numbers have been added, those will be subject to a separate Order after the appropriate motion and hearing. The rulings set forth herein for all exhibits disclosed on Edwards' December 7, 2017, Second Amended Exhibit List that have not been modified will remain unchanged.



1. On or before December 20, 2017, Edwards shall produce to Epstein all trial exhibits that have not been previously produced in the form to be introduced at trial with the exception of Exhibit No. 113 which is addressed separately in paragraph 2 below. (12/5/17 Tr. 216, 219, 226, 228.)

2. On or before January 5, 2018, Edwards shall produce to Epstein the specific court filings to be used as trial exhibits from the Crime Victims' Rights Act proceeding (*Jane Does #1 and #2 v. United States of America*, U.S. District Court, Southern District of Florida, Case No. 08-80736-Civ-Marra/Johnson) designated as Edwards' Trial Exhibit No. 113. Edwards shall not produce each and every item identified on the Court's docket, but shall cull out the specific items he intends to use at trial. The Court hereby sustains Epstein's objection to Exhibit No. 113 as being overbroad. The Court will revisit this ruling if Edwards narrows the documents he intends to introduce at trial. (12/5/17 Tr. 218:25-226:14.)

3. As set forth in more detail below, the Court has sustained Epstein's objections to a number of Edwards' trial exhibits. Those objections will be sustained unless there is a showing at trial that the exhibits are relevant and material to the issues to be determined. For example, exhibits may be admissible if they relate to Edwards' three clients (L.M., E.W. and Jane Doe), if they relate to issues concerning Edwards' preparation and evaluation of his clients' cases, or for any other reason enunciated by the Court on the record at the November 29, 2017 and December 5, 2017 hearings. In those instances, Edwards will be allowed to speak generically about the facts surrounding those exhibits, but will not necessarily be allowed to introduce the exhibits at trial without further Order of the Court. The Court will make decisions on an item-by-item basis at the appropriate time. Any discussions relating to an exhibit to which an objection has been sustained shall be conducted outside the presence of the jury. (12/5/17 Tr. 153:16-160:24; 198:19-199:5.)

4. As set forth in more detail below, the Court defers rulings on Epstein's objections directed to Edwards' trial exhibits concerning Epstein's net worth and in support of Edwards' punitive damages claim. The Court will address these objections at the appropriate time. (12/5/17 Tr. 163:17-164:15.)

5. The Court makes the following specific findings:

LEGEND FOR EPSTEIN'S 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	Court's Ruling
1.	All applicable criminal statutes	3, 4, 7, 11, 12	Not addressed at hearing
2.	All applicable Florida Statutes	3, 4, 7, 11, 12	Not addressed at hearing
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12	<u>11/29/17 Tr. 160:6-162:15</u> Deferred
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	<u>11/29/17 Tr. 162:16-167-9</u> Sustained
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10	<u>11/29/17 Tr. 167:11-13</u> Overruled

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
6.	Jane Doe 102 Complaint	3, 4, 7, 13	<u>11/29/17 Tr. 167:14-170:9</u> Sustained
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14	<u>11/29/17 Tr. 171:22-176:9</u> Deferred. Not to be mentioned during opening statements.
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14	<u>11/29/17 Tr. 176:10-187:8</u> Deferred. Not to be mentioned during opening statements.
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11	<u>12/5/17 Tr. 64:8-81:17; 85:11-22</u> Sustained
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14	<u>12/5/17 Tr. 81:18-82:17; 146:14-149:19; 159:12-160:7</u> Sustained
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11 14	<u>12/5/17 Tr. 149:20-150:1; 159:12-160:7</u> Sustained
12.	Jail Visitation Logs	3, 4, 7, 8, 11	<u>12/5/17 Tr. 150:2-3; 159:12-160:7</u> Sustained
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11	<u>12/5/17 Tr. 150:4-152:11; 159:12-160:7</u> Sustained
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10	<u>12/5/17 Tr. 152:14-153:13</u> Deferred
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8	<u>12/5/17 Tr. 153:16-160:24</u> Sustained
16.	Video of Search Warrant of Jeffrey Epstein's home being executed ²	3, 4, 8	<u>12/5/17 Tr. 160:25-161:21</u> Sustained
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8, Cannot be read	<u>12/5/17 Tr. 160:25-162:19</u> Sustained
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")	<u>12/5/17 Tr. 162:20-24</u> Deferred

² In his December 7, 2017, Second Amended Exhibit List, Edwards changed the description of this exhibit to: "Video of Epstein Property Inspection 01/18/10." This Order does not make any rulings on the new description and may be subject to a new Motion in Limine as Epstein deems appropriate.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets	12	<u>12/5/17 Tr. 162:25-164:15</u> Deferred
20.	Jeffrey Epstein's passport (or copy)	12	<u>12/5/17 Tr. 163:4-5; 164:16-19</u> Sustained
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14	<u>12/5/17 Tr. 164:20-24</u> Sustained
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 164:25-165:5</u> Deferred
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12	<u>12/5/17 Tr. 165:6-166:16;</u> <u>166:25-167:6</u> Not produced Deferred
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12	<u>12/5/17 Tr. 165:6-166:16</u> <u>166:25-167:6</u> Not produced Deferred
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12	<u>12/5/17 Tr. 165:6-166:16</u> <u>166:25-167:6</u> Not produced Deferred
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12	<u>12/5/17 Tr. 165:6-166:16</u> <u>166:25-167:6</u> Not produced Deferred
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home ³	3, 4, 7, 8, 10,	<u>12/5/17 Tr. 166:15-24</u> Sustained

³ In his December 7, 2017, Second Amended Exhibit List, Edwards modified this exhibit to include additional descriptive language: "(from Palm Beach State Attorney's File, Exhibit #29)." The Court finds that this language does not substantially change the exhibit and, thus, the Court's ruling holds.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
28.	Notebooks 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	<u>12/5/17 Tr. 167:7-168:16</u> Sustained in part and overruled in part. The impact upon the issues as to preparedness, knowledge, as far as Mr. Edwards is concerned – his diligence as to discovery – if those are called into question, then this exhibit may be discussed. The actual documents themselves are excessive and would be getting into other matters that would not be germane to Edwards' three clients and, therefore, may not be used until discussed outside the presence of the jury
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13	<u>12/5/17 Tr. 168:17-175:1</u> Sustained in part and overruled in part. If Edwards had access to formulate his positions as to the legitimacy of his three clients' claims, this file may come into play. The sheer amount of the criminal file would also be relevant to Mr. Epstein's state of mind at the time he filed the underlying Complaint. The individual pages are not subject to admission and would need to be discussed outside the presence of the jury.
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12	<u>12/5/17 Tr. 175:2-179:25</u> Deferred
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12	<u>12/5/17 Tr. 175:2-180:5</u> Deferred
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.	<u>12/5/17 Tr. 180:23-181:12</u> Deferred

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
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	<u>12/5/17 Tr. 188:23-192:17</u> Deferred
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	Not addressed at hearing
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13	<u>12/5/17 Tr. 192:18-22</u> Deferred
36.	All Complaints in which Jeffrey Epstein is/was defendant	3, 4, 11, 12, 13. This also includes a motion which is not part of the stated exhibit.	<u>12/5/17 Tr. 192:23-193:2</u> Deferred
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	Not addressed at hearing
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	Not addressed at hearing
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	Not addressed at hearing
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12	<u>12/5/17 Tr. 193:3-194:22</u> Deferred
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14	<u>12/5/17 Tr. 194:23-195:1</u> Deferred
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12	<u>12/5/17 Tr. 195:2-195:15</u> Deferred
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)	<u>12/5/17 Tr. 195:16-18</u> Deferred
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10	<u>12/5/17 Tr. 195:19-196:2</u> Deferred

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10	<u>12/5/17 Tr. 196:3-19</u> Sustained
46.	Victim Notification Letter from US Attorney's Office to Victims ⁴	3, 4, 7, 8, 14	<u>12/5/17 Tr. 196:20-197:2</u> Sustained
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14	<u>12/5/17 Tr. 197:3-23</u> Sustained
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8	<u>12/5/17 Tr. 197:24-198:10</u> Sustained
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 198:13-199:6</u> Sustained
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 198:13-199:6</u> Sustained
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12	<u>12/5/17 Tr. 198:13-199:6</u> Sustained
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12	<u>12/5/17 Tr. 199:8</u> Sustained
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10	<u>12/5/17 Tr. 199:9-25</u> Sustained
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14	<u>12/5/17 Tr. 200:1-3</u> Deferred
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14	<u>12/5/17 Tr. 200:1-3</u> Deferred
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	<u>12/5/17 Tr. 200:4-18</u> Not Produced Reserved ruling because documents not available
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13	<u>12/5/17 Tr. 200:19-22</u> Sustained
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13	<u>12/5/17 Tr. 200:23-24</u> Sustained
59.	Massage Table ⁵	3, 4, 12 (document marked as No. 59 is not a massage table)	<u>12/5/17 Tr. 200:25-201:21</u> Sustained

⁴ In his December 7, 2017, Second Amended Exhibit List, Edwards modified this exhibit to include additional descriptive language: "(CW & SR) 07/09/2008." The Court finds that this language does not substantially change the exhibit and, thus, the Court's ruling holds.

⁵ In his December 7, 2017, Second Amended Exhibit List, Edwards changed the description of this exhibit to: "Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)." This Order does not make any rulings on the new description and may be subject to a new Motion in Limine as Epstein deems appropriate.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13	<u>12/5/17 Tr. 201:22-202:8</u> Sustained
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 201:22-202:8</u> Sustained
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8	<u>12/5/17 Tr. 201:22-202:8</u> Sustained
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8	<u>12/5/17 Tr. 202:9-203:4</u> Deferred
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action	<u>12/5/17 Tr. 203:5-204:2</u> Deferred
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8	<u>12/5/17 Tr. 204:3-11</u> Sustained
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)	<u>12/5/17 Tr. 204:12-205:12</u> Sustained
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14	<u>12/5/17 Tr. 205:13-15</u> Deferred
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8	<u>12/5/17 Tr. 205:16-22; 206:2-207:14; 209:15-210:5</u> Sustained
69.	List of planes owned by Jeffrey Epstein ⁶	3, 4, 7, 8, 12 (document provided does not match description), 14	<u>12/15/17 Tr. 205:23-25</u> Deferred
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10	<u>12/5/17 Tr. 207:15-209:9</u> Sustained
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10	<u>12/5/17 Tr. 207:15-209:9</u> Sustained
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10	<u>12/5/17 Tr. 207:15-209:9</u> Sustained
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10	<u>12/5/17 Tr. 207:15-209:9</u> Sustained

⁶ In his December 7, 2017, Second Amended Exhibit List, Edwards changed the description of this exhibit to: "Palm Beach Police Department Incident Report dated 07/19/06 (unredacted)." This Order does not make any rulings on the new description and may be subject to a new Motion in Limine as Epstein deems appropriate.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10	<u>12/5/17 Tr. 207:15-209:9</u> Sustained
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8	<u>12/5/17 Tr. 209:10-12; 210:6-21</u> Sustained
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13	<u>12/5/17 Tr. 210:22-211:3</u> Sustained in part and overruled in part. If Edwards had access to formulate his positions as to the legitimacy of his three clients' claims, these documents may come into play. The sheer amount of the criminal file would also be relevant to Mr. Epstein's state of mind at the time he filed the underlying Complaint. The individual pages are not subject to admission and would need to be discussed outside the presence of the jury.
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	<u>12/5/17 Tr. 211:4-22</u> Sustained
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list	<u>12/5/17 Tr. 211:23-25</u> Sustained
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14	<u>12/5/17 Tr. 212:1-4</u> Deferred
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8	<u>12/5/17 Tr. 212:5-7</u> Sustained
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10	<u>12/5/17 Tr. 212:8-15</u> Sustained
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10	<u>12/5/17 Tr. 212:16-213:1</u> Sustained
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12	<u>12/5/17 Tr. 213:2-214:8</u> Not Produced Deferred
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8	<u>12/5/17 Tr. 214:9-11</u> Sustained
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14	<u>12/5/17 Tr. 214:12-20</u> Deferred

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12	<u>12/5/17 Tr. 214:21-24</u> Sustained
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11	<u>12/5/17 Tr. 214:25-215:3</u> Sustained
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11	<u>12/5/17 Tr. 214:25-215:3</u> Sustained
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11	<u>12/5/17 Tr. 215:4-5</u> Sustained
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11	<u>12/5/17 Tr. 215:4-5</u> Sustained
91.	Jeffrey Epstein notepad notes.re Maria	3, 4, 7, 8, 10, 12	<u>12/5/17 Tr. 215:6-8</u> Sustained
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13	<u>12/5/17 Tr. 215:9-17</u> Deferred
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12	<u>12/5/17 Tr. 215:18-20</u> Deferred. References to deposition excerpts not ruled upon fully; subject to specific line reference rulings which will be subject to a separate order
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12	<u>12/5/17 Tr. 215:21-216:14</u> Not produced Deferred
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10	<u>12/5/17 Tr. 216:15-17</u> Sustained
96.	Victim's school records and transcripts	3, 4, 7, 8	<u>12/5/17 Tr. 216:18-217:8</u> Sustained
97.	Victim Notification letter ⁷	3, 4, 7, 8	<u>12/5/17 Tr. 217:9-10</u> Sustained
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12	<u>12/5/17 Tr. 217:11</u> Sustained
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8	<u>12/5/17 Tr. 217:12</u> Sustained
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12	<u>12/5/17 Tr. 217:13-15</u> Sustained
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 217:16-24</u> Sustained

⁷ In his December 7, 2017, Second Amended Exhibit List, Edwards modified this exhibit to include additional descriptive language: "to Virginia Roberts, 09/03/08." The Court finds that this language does not substantially change the exhibit and, thus, the Court's ruling holds.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
102.	All items listed on the Palm Beach Police Property Report Lists ⁸	3, 4, 7, 8, 12 (items not provided)	<u>12/5/17 Tr. 217:25-218:2</u> Sustained
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12	<u>12/5/17 Tr. 218:3-10</u> Sustained
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12	<u>12/5/17 Tr. 218:12-17</u> Sustained
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,	<u>12/5/17 Tr. 218:18-22</u> Sustained
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	<u>12/5/17 Tr. 218:22-23</u> No ruling; catch all
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	Not addressed at hearing; catch all
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	Not addressed at hearing; catch all
109.	Edwards reserves all objections to Epstein's Exhibits	Not an exhibit	Not an exhibit
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit	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	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit	Not addressed at hearing; catch all
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	<u>12/5/17 Tr. 218:25-226:14</u> Sustained because of breadth, lack of specificity, without prejudice to specific documents being produced as set forth above. Specific documents must be culled out; all documents on the docket may not be identified; Edwards must narrow scope
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13	<u>12/5/17 Tr. 226:15-227:14</u> Overruled

⁸ In his December 7, 2017, Second Amended Exhibit List, Edwards modified this exhibit to include additional descriptive language: "and/or Property Receipts." The Court finds that this language does not substantially change the exhibit and, thus, the Court's ruling holds.

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12	<u>12/5/17 Tr. 227:15-229:17</u> Overruled. Edwards is ordered to produce/cull out within 15 days, if the documents have not already been produced
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13	Not addressed at hearing; catch all
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13	<u>12/5/17 Tr. 229:18-20</u> Deferred
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13	<u>12/5/17 Tr. 229:21-24</u> Deferred
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14	<u>12/5/17 Tr. 229:25-231:5</u> Deferred
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)	<u>12/5/17 Tr. 231:6-9</u> Deferred. Not to be mentioned during opening statement.
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8	<u>12/5/17 Tr. 231:10-18</u> Sustained
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12	<u>12/5/17 Tr. 231:19-20</u> Sustained
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12	Not addressed at hearing
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45	<u>12/5/17 Tr. 231:21-232:4</u> Deferred
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13	Not addressed at hearing
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009		Not addressed at hearing
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13	Not addressed at hearing
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	Not addressed at hearing
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012		Not addressed at hearing; no objections
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12	Not specifically addressed at hearing but duplicative to Exhibit No. 115 and those rulings are incorporated herein

No.	Edwards' Exhibit Description	Epstein's Objections	Court's Ruling
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8	Not specifically addressed at hearing, but deferred with Exhibit 63
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8	<u>12/5/17 Tr. 232:5-235:9</u> Deferred
133.	Any and all responses to Subpoenas Duces Tecum with or without deposition ⁹	3, 4, 6, 7, 8, 10, 11, 12, 13, 14	Not addressed at hearing; catch all
134.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12, 13	Not addressed at hearing; catch all
135.	Any and all documents produced in this action.	12	Not addressed at hearing; catch all
136.	Any and all depositions taken in this action.	12, 13	Not addressed at hearing; catch all
137.	Any documents or other exhibit attached to or used during any deposition in this action	12, 13	Not addressed at hearing; catch all
138.	Any and all exhibits, documents, etc. referred to in any deposition	12, 13	Not addressed at hearing; catch all
139.	Any and all documents and exhibits designated by all parties to this action.	12, 13	Not addressed at hearing; catch all
140.	Any and all exhibits needed for impeachment or rebuttal	12	Not addressed at hearing; catch all
141.	Any and all pleadings filed in this action	12, 13	Not addressed at hearing; catch all
142.	Any and all records produced or that will be produced by all records custodians relative to this action	12, 13	Not addressed at hearing; catch all

DONE AND ORDERED in West Palm Beach, Palm Beach County, Florida this 16 day of January, 2018.

THE HONORABLE DONALD W. HAFELE
CIRCUIT COURT JUDGE

⁹ In his December 7, 2017, Second Amended Exhibit List, Edwards has shifted Exhibit Nos. 133 through 142 to Exhibit Nos. 209 through 218. Edwards has also identified new exhibits at Exhibit Nos. 133 through 208. This Order does not make any rulings on the new exhibits which may be subject to a new Motion in Limine as Epstein deems appropriate.

Copies provided to:

SERVICE LIST

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