

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.

**NOTICE OF FILING PRELIMINARY OBJECTIONS AND COUNTER
DESIGNATIONS TO PLAINTIFF/COUNTER-DEFENDANT JEFFREY
EPSTEIN'S DEPOSITION DESIGNATIONS**

Defendant/Counter Plaintiff, Bradley J. Edwards, hereby files his Objections and
Counter Designations to the following deposition testimony designated by Jeffrey Epstein for use
in the instant case and/or as rebuttal:

A-CPA ATTORNEY-CLIENT PRIVILEGE ASSERTION

BE BEST EVIDENCE

SHK SECOND HAND KNOWLEDGE

VS VIOLATES STIPULATION

LP LITIGATION PRIVILEGE

H HEARSAY

O OPINION

R RELEVANCE

REPETITIOUS

COMPOUND/NO ANSWER

1. Bradley J. Edwards; March 23, 2010

[illegible]

Designation	Counter Desig. (BE)	Objections (BE)	Response to Objections
23:21-24:17		23:21-24:17(R)	
25:16-24			
26:8-27:3			
27:23-28:5			
29:3-17			
30:9-18			
31:10-15		31:10-15 (R)	
31:20-23		31:20-23 (R)	
36:6-16		36:6-16 (R)	
38:18-24		38:18-24 (R)	
43:4-10		43:4-10 (R)	
45:13-25		45:13-25 (R)	
	49:10-15		
	49:17-22		
	50:1-4		
	51:22-52:14		
53:4-54:4		53:4-54:4 (R)	
54:9-10		54:9-10 (R)	
54:14-22		54:14-22 (R)	
55:10-21		55:10-21 (R)	
56:1-11			
56:20-23			
57:7-25		57:7-25 (R)	
58:11-15		58:11-15 (R)	
59:2-6			
60:4-23			
63:25-65:17		63:25-64:15(R)	
67:1-68:17			
69:1-70:21			
71:11-72:13			
72:18-73:1			
74:8-12			
74:17-75:7			
75:18-76:3			
76:22-77:2			
78:9-22			
	79:7-79:23		
	80:9-16		
	80:23-24		
	81:16-20		
	82:17-83:3		
	83:8-22		
	88:6-11		
107:11-112:1			

[illegible]

Designation	Counter Desig. (BE)	Objections (BE)	Response to Objections
129:12-18			
129:20-132:18			
132:23-133:24			
	137:1-7		
	137:12-16		
	138:1-14		
	138:21-139:4		
	141:7-9		
	141:11-13		
	141:15-16		
	141:23-142:3		
	146:4-16		
153:2-3			
153:9-11			
153:13-20			
156:2-157:25		156:1-160:2 (R)	
158:4-160:2	158:1-3		
162:21-163:7		162:21-163:7 (R)	
164:21-166:1		164:21-166:1 (R)	
166:22-167:5		166:22-167:5 (R)	
174:24-175:16		174:24-175:16(R)	
175:22-176:4		175:22-176:4 (R)	
180:5-20		180:5-20 (R)	
182:5-25		182:5-25 (R)	
183:16-184:3		183:16-20	
185:2-186:17		185:2-186:17(R)	
193:1-13			
197:14-18, 24		197:14-198:6(R)	
198:2-6			
	203:19-204:3		
	206:20-207:3		
	207:8-15		
228:1-9			
228:12-13			
228:15-229:14		228:15-229:25(R)	
229:19-24			
230:15-231:12			
231:23-232:2			
232:7-8			
232:10			
232:13-14			
232:21-233:6			
233:9-11			
233:13-234:6			

[illegible]

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
249:10-11			
249:13-252:6		252:1-6 (R)	
	261:1-7		
	263:7-264:7		
264:8-265:1			
265:3-7			
265:9-10			
276:3-11			
277:7-279:4			
	280:6-281:13		
	282:6-9		
283:5-284:2		283:10-17 (R)	
		283:18-19 (R)	
		283:20-284:2(R)	
286:12-287:6		286:12-287:6(R)	
292:12-18			
303:11-22			

2. Bradley J. Edwards; May 15, 2013

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
5:13-14			
5:23-6:2			
6:11-19			
	6:20-24		
7:3-20			
7:25-8:7		7:16-20 Repetitious	
9:3-7		9:3-7 Repetitious	
11:8-10			
	11:11-20		
11:21-12:3			
12:10-13			
	14:24-15:3		
	15:17-16:3		
16:4-15			
17:16-18:16			
18:20-19:4			
22:24-23:5			
23:25-24:15			
24:19-25:4			
25:9-12			
25:19-29:1			
29:11-22		29:19-30:7	

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NOTA

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
45:6-17			
46:9-47:2			
47:14-23			
	47:24-48:3		
48:4-23			
49:7-19			
55:10-57:8		57:5-6 (R),Hearsay	
57:15-58:5			
	58:6-59:5		
60:20-61:16		60:24-61:1Rule 403	
62:6-10			
70:24-71:20			
72:11-25		72:20-25 R, A-C	
	74:18-25		
	75:8-13		
75:14-76:8			
	76:11-21		
	76:25-78:9		
	79:4-8		
	79:13-15		

3. Bradley J. Edwards; October 10, 2013

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
	113:7-25		
	117:9-21		
	125:9-11		
130:12-25		130:12-25 Colloquy of Counsel, R, C	
132:25-133:10	133:11-13		
	134:5-7		
134:23-137:22			
	138:12-139:1		
139:6-22		139:6-22 R, LP	
	140:24-141:12		
	141:23-142:25		
143:1-144:9		143:1-20 R, LP	
	144:19-145:16		
152:11-153:14		152:11-153:14R,LP	
205:9-22		205:9-22 R, LP	
206:10-207:8			
	207:9-208:1		
	208:7-209:13		

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
28:19-29:14		28:19-29:14	
		R, H, LP, VS	
29:22-31:7		29:22-30:18 H,LP,	
		VS	
		31:1-32:11 R,H,LP	
		VS, SHK, BE	
31:15-18		R,H,LP,VS,SHK,	
		BE	
31:20-32:1		R,H,LP, VS, SHK	
		BE	
32:3-11		R,H,LP,VS, SHK,	
		BE	
32:25-33:12		32:25-33:12 H,SHK	
		BE,LP	
33:14-21			
34:3-35:3		34:3-34:25 H, SHK	
		LP	
36:10-37:3			
37:8-39:2		37:18-38:25 LP,H	
39:5-20			
43:2-3			
43:25-44:3			
46:16-20			
46:22			
47:3-6			
47:8-11			
47:18-21			
48:4-8			
48:13-16		48:13-49:1R,H,LP	
		SHK	
48:19-49:1		R,H,LP, SHK	
49:13-21		49:13-50:4 R,H,LP	
		SHK	
49:24-51:4		50:5-51:4 R,H,LP	
		SHK	
51:15-17		51:15-52:17 H,LP,	
		A-C, PA, SHK	
51:20-52:17		H,LP,A-C,PA,SHK	
53:8-11		53:8-24 H,SHK,	
		LP,A-C, PA	
53:13-24		H,SHK,LP,A-C,PA	
54:11-55:1			
55:5-22			

Designation	Completeness/Counter/ Cross Designation	Objections	Response to Objections
20:23-21:5			

6. Scott Rothstein; December 12, 2011 (*Razorback Funding v. Rothstein*, 17th Judicial Circuit Case No. 09-062943)

Designation	Completeness/Counter/ Cross Designation	Objections	Response to Objections
58:8-17		58:8-62:6 H,R,LP	
58:21-60:18			
60:20-62:20		61:15-61:25 H,R,LP	
		C	
		62:1-61:6 R,H, O	

7. Scott Rothstein; June 14, 2012

Designation	Completeness/Counter/ Cross Designation	Objections	Response to Objections
4:2-5			
5:11-16			
5:23-6:22			
6:25-9:9			
9:12-10:19			
16:3-17:17			
18:19-19:3			
19:24-21:4			
21:17-22:9			
22:22-25:6			
25:8-27:23			
28:12-31:16			
32:8-33:12			
33:25-34:5			
34:7-19			
35:3-12			
35:21-43:4			
43:15-44:5			
45:2-7			
46:5-19			
47:17-49:6			
51:4-53:22			
54:2-55:7			
55:12-57:2			
59:13-62:19			

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Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
68:24-69:8			
69:21-22			
69:24			
70:17-71:22			
76:8-77:20			
79:10-24			
80:12-23			
83:2-16			
85:18-23			
86:4-89:10			
92:4-93:14			
94:3-15			
95:1-20			
98:21-99:22			
104:4-12			
105:7-107:11			
110:12-19			
110:21-111:12			
112:3-12			
115:10-116:19			
117:14-118:2			
118:14-120:4			

8. **Russell S. Adler; April 20, 2011**

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:14-5:12			
11:11-23			
12:16-14:14			
14:20-18:6			
18:20-20:1			
23:4-25:7			
25:21-27:10			
27:14-21			
30:10-32:17			
32:24-33:4			
35:9-17			
38:18-41:18			
42:13-43:22			
44:1-47:8			
53:15-56:21			
57:5-58:14			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
63:10-25			
73:14-74:15			
77:21-78:4			
78:6-17			
78:23-79:14			
79:24-81:15			
82:13-83:18			
83:25-86:5			
86:15-87:12			
89:10-90:15			
93:25-95:12			
96:1-8			
99:23-100:21			
101:19-102:7			
103:12-104:21			
106:4-23			
106:25-107:4			
107:15-23			
108:1-5			
115:6-120:9			
121:8-123:17			
124:20-126:14			

9. **Russell Adler; October 28, 2010 (In re Rothstein Rosenfeldt Adler, P.A., U.S.D.C.
Case No. 10-2612-BKC-RBR)**

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:1-5:10			
9:5-12:14			
16:22-20:12			
22:9-24:22			
25:3-26:20			
39:9-51:5			
51:10-13			
51:20-52:8			
52:11-14			
52:19-63:15			
70:21-75:6			
75:9-78:7			
80:14-81:25			
83:22-88:24			
100:18-105:22			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
105:25-106:3			
107:1-108:18			
111:6-121:18			
124:7-18			
124:23-127:19			
129:4-12			
131:5-134:25			
144:4-152:20			
154:4-155:17			
158:19-159:18			
161:22-164:14			
167:13-168:7			
169:6-170:2			
174:21-175:17			
179:23-188:14			
198:4-199:7			

10. Dean Russell Kretschmar; February 11,

2011 Entire transcript

11. Michael Legamaro; March 11, 2011

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:10-11			
9:21-22			
11:2-9			
11:22-12:17			
13:7-14:1			
14:22-15:5			
15:16-19:2			
19:21-24:15			
25:6-26:7			
27:11-28:25			
29:7-20			
30:10-31:9			
45:22-46:4			
46:24-47:10			
47:14-51:1			
51:4			
51:6-17			
52:1-53:22			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
53:24-54:6			
65:18-66:2			
67:16-23			

12. Abraxas Joseph Discala; May 25, 2011

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
5:3-21			
7:13-19			
7:25-8:10			
8:20-9:5			
10:9-18			
10:22-11:6			
28:5-14			
28:17-20			
28:25-29:15			
30:5-25			
45:13-22			
47:13-22			
87:22-88:13			
88:22-89:1			
89:14-17			
90:8-23			
91:7-11			
91:14-92:16			
93:17-18			
93:21-94:6			
95:1-17			
99:25-100:11			
101:5-11			
103:10-14			
107:7-108:3			
108:21-23			
116:19-117:10			
117:13			
117:15-118:12			
119:10-15			
123:10-18			
127:6-9			
127:12-128:12			
128:24-129:4			
130:12-18			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
130:25-131:13			
132:13-25			
134:20-135:2			
136:6-12			
141:7-19			
141:21-23			
142:11-13			
150:21-151:8			
152:4-10			
152:18-20			
152:22-153:5			
154:4-14			
155:12-25			
156:7-21			
158:17-159:24			
160:3-8			
160:13-161:5			
161:10-11			
176:8-22			
179:5-11			
180:22-182:2			
184:2-11			
184:19-185:11			
185:16-22			
186:5-187:14			
187:16-189:15			
191:6-192:13			
195:7-196:11			
199:24-200:3			
200:5-12			
200:19-21			
200:23-201:16			
203:16-21			
204:3-7			
205:8-10			
205:12-206:2			
206:4-11			
206:20-207:6			
208:7-13			
208:16-18			
212-9-213:22			
214:24-25			
215:6-9			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
246:7-247:22			
248:7-249:7			
252:10-253:10			
254:6-12			
254:19-256:4			
258:16-259:25			
260:7-12			
260:24-261:13			
275:14-276:20			
277:2-6			
277:16-21			
281:19-283:3			
283:10-284:9			
284:15-25			
285:21-23			
286:4-10			
286:14-18			
286:20-21			
290:4-13			
356:2-18			
356:23-357:7			
357:16-358:11			
358:15-16			
365:20-366:6			
366:8-22			

13. Courtney E. Wild; October 12, 2017

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
5:3-11:22			
14:10-18			
14:21-15:12			
15:15-16:2			
16:7-10			
16:14-18			
17:18-19:16			
20:22-25:17			
26:24-28:8			
28:11-29:4			
34:2-16			
34:18-35:6			
45:3-47:19			

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
47:23-49:21			
51:13-21			
53:14-54:15			
54:17-56:8			
56:21-57:3			
57:9-13			
57:15-58:9			
86:8-22			
91:14-92:10			
108:21-109:2			
116:16-22			
117:7-118:7			
120:6-23			
121:6-122:23			
123:8-124:23			

Bradley J. Edwards expressly reserves the right to amend or supplement these objections to designations, including any additional depositions taken in this or other related matters.

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 8th day of December, 2017.



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