

#291874/mep

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,  
\_\_\_\_\_ /**REVISED**  
**EXHIBIT LIST OF COUNTERPLAINTIFF, BRADLEY EDWARDS**COMES NOW the Counterplaintiff, BRADLEY J. EDWARDS, by and through his  
undersigned attorneys and hereby lists his exhibits for trial as follows:

| DEF.<br>NO. | PLF.<br>NO. | DATE<br>OFFERED | MARK | ADMIT<br>TED | DESCRIPTION OF EXHIBITS  |
|-------------|-------------|-----------------|------|--------------|--|
|             |             |                 |      |              | <b><u>EXHIBITS EXPECTED TO BE USED</u></b>   |
|             | 1.          |                 |      |              | All applicable criminal statutes   |
|             | 2.          |                 |      |              | All applicable Florida Statutes  |
|             | 3.          |                 |      |              | All applicable Rules of Evidence   |
|             | 4.          |                 |      |              | Video of Jeffrey Epstein's home and route from victim to Epstein's home  |
|             | 5.          |                 |      |              | Order confirmation from Amazon.com for purchase of books<br>"SM 101: A Realistic Introduction," "Slave Craft: Roadmap for<br>Erotic Servitude-Principles, Skills and Tools" and "Training Miss |

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|----------|----------|--------------|------|----------|--|
|          |          |              |      |          | Abernathy:<br>A Workbook for Erotic Slaves and Their Owners”   |
|          | 6.       |              |      |          | Non-Prosecution Agreement  |
|          | 7.       |              |      |          | Jane Doe 102 Complaint   |
|          | 8.       |              |      |          | Messages taken from message pads found at Epstein’s home   |
|          | 9.       |              |      |          | Documents related to Jeffrey Epstein produced by Alfredo Rodriguez   |
|          | 10.      |              |      |          | Jeffrey Epstein flight logs  |
|          | 11.      |              |      |          | Jeffrey Epstein phone records  |
|          | 12.      |              |      |          | Sarah Kellen’s phone records   |
|          | 13.      |              |      |          | Jail Visitation Logs   |
|          | 14.      |              |      |          | Jeffrey Epstein’s probation file   |
|          | 15.      |              |      |          | All probable cause affidavits related to criminal investigation of Jeffrey Epstein                                     |
|          | 16.      |              |      |          | All evidence, information and documents taken or possessed by FBI related to criminal investigation of Jeffrey Epstein |
|          | 17.      |              |      |          | Victims’ statements to the FBI related to criminal investigation of Jeffrey Epstein                                    |
|          | 18.      |              |      |          | Video of Search Warrant of Jeffrey Epstein’s home being executed   |
|          | 19.      |              |      |          | Application for Search Warrant of Jeffrey Epstein’s home   |
|          | 20.      |              |      |          | Complaint Jane Doe v. Epstein and all subsequent Amended Complaints  |
|          | 21.      |              |      |          | All records of homes, properties, bank accounts and any and all records related to Jeffrey Epstein’s assets            |
|          | 22.      |              |      |          | Jeffrey Epstein’s passport (or copy)   |
|          | 23.      |              |      |          | Jeffrey Epstein’s driver’s license (or copy)   |

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|----------|----------|--------------|------|----------|--|
|          | 24.      |              |      |          | List of corporations owned by Jeffrey Epstein  |
|          | 25.      |              |      |          | All documents evidencing relationship between Jeffrey Epstein and Jean Luc Brunel  |
|          | 26.      |              |      |          | All documents evidencing relationship between Jeffrey Epstein and MC2 or any modeling agencies   |
|          | 27.      |              |      |          | Yearbooks of Jane Doe  |
|          | 28.      |              |      |          | 2002 Royal Palm Beach High School Year Book  |
|          | 29.      |              |      |          | 2001 Royal Palm Beach High School Year Book  |
|          | 30.      |              |      |          | 2003 Palm Beach Gardens High School Year Book  |
|          | 31.      |              |      |          | Affidavit and Application for Search Warrant on Jeffrey Epstein's home   |
|          | 32.      |              |      |          | Tape recording or transcript of recording of conversation between Jeffrey Epstein and George Rush  |
|          | 33.      |              |      |          | Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation   |
|          | 34.      |              |      |          | The Palm Beach State Attorney's Criminal file against Jeffrey Epstein  |
|          | 35.      |              |      |          | All documents related to Jeffrey Epstein's 6/30/08 conviction  |
|          | 36.      |              |      |          | Jeffrey Epstein's criminal plea colloquy   |
|          | 37.      |              |      |          | Public records from the Department of Corrections related to Jeffrey Epstein   |
|          | 38.      |              |      |          | Records from the Florida Department of Law Enforcement related to Jeffrey Epstein  |
|          | 39.      |              |      |          | All statements made by Jeffrey Epstein   |
|          | 40.      |              |      |          | List of properties and vehicles in Larry Visoski's name  |
|          | 41.      |              |      |          | 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 |

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|----------|----------|--------------|------|----------|--|
|          | 42.      |              |      |          | 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<br><br>09-81092     |
|          | 43.      |              |      |          | Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him  |
|          | 44.      |              |      |          | All Complaints in which Jeffrey Epstein was a plaintiff or defendant   |
|          | 45.      |              |      |          | 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 |
|          | 46.      |              |      |          | Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB       |
|          | 47.      |              |      |          | Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No. 502009CA040800XXXXMBAG  |
|          | 48.      |              |      |          | Any and all newspaper articles, online articles or publications related to Jeffrey Epstein   |
|          | 49.      |              |      |          | Report and Analysis of Jeffrey Epstein's assets  |
|          | 50.      |              |      |          | Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.   |
|          | 51.      |              |      |          | Photos of all of Jeffrey Epstein's properties, cars, boats and planes  |
|          | 52.      |              |      |          | Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen  |
|          | 53.      |              |      |          | Audio tape of Haley Robson   |
|          | 54.      |              |      |          | Photographs, videos and books taken in the search warrant of Jeffrey Epstein's home  |
|          | 55.      |              |      |          | Documents related to or evidencing Jeffrey Epstein's donations to law enforcement  |
|          | 56.      |              |      |          | Victim Notification Letter from US Attorney's Office to Victim   |

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|----------|----------|--------------|------|----------|---|
|          | 57.      |              |      |          | Expert Dr. L. Dennison Reed's Report of Victim  |
|          | 58.      |              |      |          | Palm Beach Police Department Incident Report dated 4/20/06  |
|          | 59.      |              |      |          | All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein                                  |
|          | 60.      |              |      |          | All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein  |
|          | 61.      |              |      |          | Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs   |
|          | 62.      |              |      |          | Passenger lists for flights taken by Jeffrey Epstein  |
|          | 63.      |              |      |          | Letter from Jeffrey Epstein to Alberto Pinto regarding house island project   |
|          | 64.      |              |      |          | Jeffrey Epstein's bank statements   |
|          |          |              |      |          | Jeffrey Epstein's tax returns   |
|          | 65.      |              |      |          | MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant |
|          | 66.      |              |      |          | DVD of plea and colloquy taken on 6-30-08   |
|          | 67.      |              |      |          | Transcript of plea and colloquy taken on 6-30-08  |
|          | 68.      |              |      |          | Massage Table   |
|          | 69.      |              |      |          | Lotions taken from Jeffrey Epstein's home during search warrant   |
|          | 70.      |              |      |          | Computers taken from Jeffrey Epstein's home during search warrant   |
|          | 71.      |              |      |          | Vibrators, dildos and other sex toys taken from Jeffrey Epstein's home during search warrant  |
|          | 72.      |              |      |          | No Contact Orders entered against Jeffrey Epstein   |
|          | 73.      |              |      |          | Criminal Score Sheet regarding Jeffrey Epstein  |
|          | 74.      |              |      |          | Documents evidencing Jeffrey Epstein's Community  |

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|----------|----------|--------------|------|----------|--|
|          |          |              |      |          | Control and Probation  |
|          | 75.      |              |      |          | Jeffrey Epstein's Sex Offender Registration                            |
|          | 76.      |              |      |          | Jeffrey Epstein's Booking photograph                                   |
|          | 77.      |              |      |          | CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480                    |
|          | 78.      |              |      |          | List of Jeffrey Epstein's House contacts                               |
|          | 79.      |              |      |          | Documents related to Jeffrey Epstein's investments                     |
|          | 80.      |              |      |          | Letter from Chief Michael Reiter to Barry Krischler                    |
|          | 81.      |              |      |          | List of planes owned by Jeffrey Epstein                                |
|          | 82.      |              |      |          | Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06     |
|          | 83.      |              |      |          | Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06     |
|          | 84.      |              |      |          | Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06     |
|          | 85.      |              |      |          | Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06      |
|          | 86.      |              |      |          | Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06     |
|          | 87.      |              |      |          | Letter from Goldberger dated 6-22-06                                   |
|          | 88.      |              |      |          | All subpoenas issued to State Grand Jury                               |
|          | 89.      |              |      |          | Documents related to the rental of a vehicle for Vanessa Zalis         |
|          | 90.      |              |      |          | Ted's Sheds Documents  |
|          | 91.      |              |      |          | Documents related to property searches of Jeffrey Epstein's properties |
|          | 92.      |              |      |          | Arrest Warrant of Sarah Kellen   |
|          | 93.      |              |      |          | Police report regarding Alexandra Hall picking up money dated 11-28-04 |

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|----------|----------|--------------|------|----------|---|
|          | 94.      |              |      |          | List of Trilateral Commission Members of 2003           |
|          | 95.      |              |      |          | Alan Dershowitz Letter dated 4-19-06 and Statute 90.410 |
|          | 96.      |              |      |          | Guy Fronstin letter dated 4-17-06                       |
|          | 97.      |              |      |          | Jeffrey Epstein Account Information                     |
|          | 98.      |              |      |          | Jeffrey Epstein Criminal Closeout Sheet                 |
|          | 99.      |              |      |          | Jeffrey Epstein Polygraph Test and Results              |
|          | 100.     |              |      |          | Victim's GED testing information and results            |
|          | 101.     |              |      |          | JEGE, Inc. Passenger Manifest                           |
|          | 102.     |              |      |          | Hyperion Air Passenger Manifest                         |
|          | 103.     |              |      |          | Flight information for Dana Burns                       |
|          | 104.     |              |      |          | Passenger List Palm Beach flights 2005                  |
|          | 105.     |              |      |          | Jeffrey Epstein notepad notes                           |
|          | 106.     |              |      |          | Pleadings of Jane Doe 1 and 2 v. US case                |
|          | 107.     |              |      |          | Jeffrey Epstein 5 <sup>th</sup> Amendment Speech        |
|          | 108.     |              |      |          | Reiter letter to Krisher dated 5-1-06                   |
|          | 109.     |              |      |          | Jail receipts of Jeffrey Epstein                        |
|          | 110.     |              |      |          | Alexandra Hall Police Report dated 11-28-04             |
|          | 111.     |              |      |          | Compulsory Medial Examination of victim, CMA            |
|          | 112.     |              |      |          | Victim's school records and transcripts                 |
|          | 113.     |              |      |          | Victim Notification letter dated 7-9-08                 |

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|----------|----------|--------------|------|----------|---|
|          | 114.     |              |      |          | Victim's employment records from IHOP   |
|          | 115.     |              |      |          | Police report of Juan Alessi theft at Jeffrey Epstein's home  |
|          | 116.     |              |      |          | Victim's Medical Records from Milton Girls Juvenile Facility  |
|          | 117.     |              |      |          | Victim's Medical Records from Dr. Randee Speciale   |
|          | 118.     |              |      |          | Victim's Medical Records from Wellington Regional Hospital  |
|          | 119.     |              |      |          | Victim's Medical Records from St. Mary's Medical Center   |
|          | 120.     |              |      |          | Victim's Medical Records from United Health   |
|          | 121.     |              |      |          | All surveillance conducted by law enforcement on Jeffrey Epstein's home   |
|          | 122.     |              |      |          | Emails received from Palm Beach Records related to Jeffrey Epstein  |
|          | 123.     |              |      |          | All items listed on the Palm Beach Police Property Report Lists   |
|          | 124.     |              |      |          | All items taken in the execution of the search warrant of Jeffrey Epstein's home: 358 EL BRILLO WAY, PALM BEACH FL 33480                            |
|          | 125.     |              |      |          | All copies of convictions related to Jeffrey Epstein  |
|          | 126.     |              |      |          | Jeffrey Epstein criminal records  |
|          | 127.     |              |      |          | All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey   |
|          | 128.     |              |      |          | Photographs of all persons listed on Victims' Witness Lists   |
|          | 129.     |              |      |          | Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto |
|          | 130.     |              |      |          | Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause                           |
|          | 131.     |              |      |          | Curriculum vitae of any and all listed experts  |
|          | 132.     |              |      |          | Curriculum vitae of Dr. Ryan Hall   |



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|----------|----------|--------------|------|----------|---|
|          | 133.     |              |      |          | Any articles or publications of Dr. Ryan Hall   |
|          | 134.     |              |      |          | Any articles or publications of Dr. Richard Hall  |
|          | 135.     |              |      |          | Any articles or publications of Dr. L. Dennison Reed  |
|          | 136.     |              |      |          | All items and documentation review by Dr. L. Dennison Reed  |
|          | 137.     |              |      |          | Transcript and video (DVD) of IME of Victims  |
|          | 138.     |              |      |          | All exhibits to Dr. L. Dennison Reed's Deposition   |
|          | 139.     |              |      |          | All exhibits to Dr. Richard Hall's Deposition   |
|          | 140.     |              |      |          | All items and documents reviewed by Dr. Richard Hall  |
|          | 141.     |              |      |          | All items and documents reviewed by Dr. Ryan Hall   |
|          | 142.     |              |      |          | All exhibits listed on the Epstein's Exhibit List   |
|          | 143.     |              |      |          | Demonstrative aids and exhibits including, but not limited to, anatomical charts, diagrams and models, surveys, photographs and similar material including blow-ups of the aforesaid items. |
|          | 144.     |              |      |          | <del>Any and all mortality tables</del>   |
|          | 145.     |              |      |          | Edwards' reserves all objections to Epstein's Exhibits  |
|          | 146.     |              |      |          | Edwards reserves the right to supplement and/or amend his Exhibit List  |
|          | 147.     |              |      |          | 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.  |
|          | 148.     |              |      |          | All exhibits listed by Epstein subject to Edwards' objections.  |
|          | 149.     |              |      |          | 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.                       |
|          | 150.     |              |      |          | All attachments to Edwards' Motion for Summary Judgment.  |

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|----------|----------|--------------|------|----------|---|
|          | 151.     |              |      |          | All time records and hourly billing documentation produced in discovery.              |
|          | 152.     |              |      |          | All deposition testimony and discovery responses by Epstein submitted in this action. |
|          | 153.     |              |      |          | All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.                |
|          | 154.     |              |      |          | All submissions by Epstein in connection with the Rothstein deposition.               |
|          | 155.     |              |      |          | All Settlement Agreements between Epstein and victims of his sexual molestations.     |

Plaintiff reserves the right to amend this list.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by E-Service to all counsel on the attached list, this 6th day of January 2014.

Jack Scarola

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