

IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT OF FLORIDA, IN AND
FOR PALM BEACH COUNTY

Case No. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants,

JOINT PRETRIAL STIPULATION

Pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") and Defendant/Counter-Plaintiff Bradley Edwards ("Edwards") hereby submit this Joint Pretrial Stipulation.

1. List of All Pending Motions:

- a. Edwards' Motion to Determine Entitlement to Adverse Inference and Precluding Epstein from Offering Evidence at Trial;
- b. Epstein's Motion to Quash Edwards's Subpoenas *Duces Tecum* and for Sanctions;
- c. Epstein's Motion for Summary Judgment.
- d. Epstein's Motion in Limine.
- e. Edwards' Motion to Compel Answers to Interrogatories

2. **Stipulated Facts:** None.

3. **Statement of Issues of Fact for Determination at Trial:**

a. Plaintiff contends that the following are issues of fact for determination at trial:

1. Whether Epstein had probable cause to bring suit against Edwards for the claims brought by him;

2. Did Epstein maliciously and improperly set in motion a chain of events that lead to the initiation of a judicial proceeding against Edwards?

3. Whether Epstein sued Edwards maliciously;

4. Whether Epstein continued the prosecution of the claims against Edwards out of malice and for the ulterior motive of attempting to extort Edwards;

5. Whether Epstein engaged in an illegal, improper, or perverted use of the judicial process by his actions in the case he pursued against Edwards;

6. Whether and to what extent Edwards has been damaged in the past and will continue to be damaged in the future;

7. Whether and in what amount it is appropriate to impose punitive damages against Epstein

b. Defendant contends that the following are issues of fact for determination at trial:

1. Epstein agrees that Edwards must prove each and every one of the issues listed above.

2. Whether Edwards has overcome the litigation privilege.
3. Each and every allegation in Edwards's Complaint.

4. Exhibit Lists (with Objections):

Plaintiff's Exhibit List is attached as Exhibit A

Defendant's Exhibit List is attached as Exhibit B

5. Witness Lists:

Plaintiff's Witness List is attached as Exhibit A

Defendant's Witness List is attached as Exhibit B

6. **Estimated Trial Time:** 12 trial days

7. Names, Addresses, and Telephone Numbers of Attorneys to Try the Case:

For Plaintiff:

Jack Scarola, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Phone: (561) 686-6300
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For Defendant:

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Jack Goldberger, Esq.
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West Palm Beach, FL 33401

Tonja Haddad Coleman, Esquire
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Tonja Haddad, P.A.
315 SE 7th Street, Suite 301
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Phone: (954)-467-1223
Fax: (954)-337-3716

8. Number of Peremptory Challenges Per Party: 3

9. Short, Plain Statement of the Case Which Will Be Read to the Jury:

Edwards' Proposed Statement:

Jeffrey Epstein was criminally accused of engaging in illicit sexual activity with multiple under-aged females. More than 20 persons alleging to be victims of Epstein's crimes brought civil suits against Epstein. Several of those persons were represented by Attorney Bradley Edwards. While the claims on behalf of those persons were being prosecuted by Edwards, it was publicly disclosed that the senior partner in the law firm that employed Edwards, Scott Rothstein, had conducted a fraudulent scheme which, in part, had used the claims against Epstein to induce investors to buy interests in non-existent settlements. Rothstein's scheme raised hundreds of millions of dollars and was one of the largest frauds in U.S. history.

After the Rothstein scheme unraveled and the fraud was publicly disclosed, Epstein went to his attorneys and arranged for a lawsuit to be filed against Edwards. Epstein's attorneys then filed suit against Edwards alleging that he was a knowing participant in Rothstein's fraud. Epstein later settled the claims being prosecuted by Edwards on his client's behalf, but Edwards continued to pursue an action challenging the plea deal Epstein struck with the Federal government.

Bradley Edwards defended against Epstein's lawsuit, challenging it on the grounds that it had no legal or factual support. Shortly before the Court was scheduled to rule on Mr. Edwards' challenge, Epstein dropped all of his claims against Edwards. Bradley Edwards has now sued

Jeffrey Epstein alleging that the sole reason for Epstein's lawsuit was an attempt to intimidate Edwards into abandoning or compromising his clients' interests.

Epstein's Proposed Statement:

Jeffrey Epstein was a Defendant in three civil suits in which Bradley Edwards was the prosecuting attorney. During the time that the litigation was pending, Edwards became a partner at the law firm of Rothstein Rosenfeldt Adler (RRA), which was a front for the largest Ponzi scheme in South Florida history. The cases against Epstein that were being prosecuted by Edwards while he was a partner at RRA were used to further the Ponzi scheme and defraud investors of millions of dollars. Edwards's partner at RRA and the Co-Defendant in this case, Scott Rothstein, plead guilty and is serving fifty (50) years in prison. The investigation into the RRA Ponzi scheme is still ongoing.

Epstein, learning of the use of his cases in the Ponzi scheme, reviewing what had transpired in the litigations against him during the time frame during which his cases were prosecuted by RRA, and reading about the several other lawsuits filed against RRA for the Ponzi scheme that included the use of his cases, filed suit against Edwards and his partner Rothstein. Edwards immediately filed his Counterclaim for Abuse of Process and Malicious Prosecution. Epstein has temporarily dismissed his case against Edwards because of the difficulty he was having gathering discovery and other information to prove his case due to adverse rulings from the Court regarding discovery, the inability to get documents from the Trustee for RRA, and the ongoing federal investigation into RRA and the Ponzi scheme.

10. Detailed List of All Agreements and Stipulations that May Affect the Trial:

None

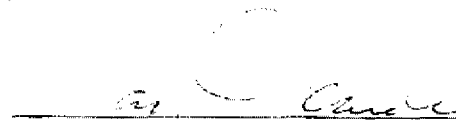
11. Certification of Counsel:

Each of the attorneys who will try the case have read the Order Setting Trial and
and have fully complied with the Order or will comply by the first day of trial.

DATED this 10th day of October, 2013.



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Attorneys for Bradley J. Edwards

#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. NO.	PLF. NO.	DATE OFFERED	MARK	ADMIT TED	DESCRIPTION OF EXHIBITS
					<u>EXHIBITS EXPECTED TO BE USED</u>
	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 "SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss

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REVISED EXHIBIT LIST OF COUNTERPLAINTIFF, BRADLEY EDWARDS

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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
					Abernathy: 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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REVISED EXHIBIT LIST OF COUNTERPLAINTIFF, BRADLEY EDWARDS

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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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 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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REVISED EXHIBIT LIST OF COUNTERPLAINTIFF, BRADLEY EDWARDS

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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
					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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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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.				JEJE, 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 th 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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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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.				Any and all mortality tables
	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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REVISED EXHIBIT LIST OF COUNTERPLAINTIFF, BRADLEY EDWARDS

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DEF. NO.	PLF. NO.	DATE OFFERED	MARK	ADMITTED	DESCRIPTION OF EXHIBITS
	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 10th day of September, 2013.



Jack Scarola

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Attorneys for Jeffrey Epstein

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IN THE CIRCUIT COURT OF THE
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CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

AMENDED WITNESS LIST OF COUNTERPLAINTIFF, BRADLEY J. EDWARDS

COMES NOW the Counterplaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys, and hereby lists his witnesses for trial as follows:

1. Bradley J. Edwards
2. Jeffrey Epstein
3. Avarell Cordero
140 W End Avenue, Apt. 30B
New York, NY 10023
4. Alan Dershowitz
Hauser Hall 520
1575 Massachusetts Avenue
Cambridge, MA 02138
5. Donnie Ingram
1242 S.W. Briarwood Drive
Port St. Lucie, FL 34985
6. Robert Josefsberg, Esquire
Podhurst Orseck, P.A.
25 West Flagler Street, Suite 800
Miami, FL 33130

7. Howard Rubinstein
1345 Avenue of the Americas, 30th Floor
New York, NY 10105
8. All attorneys currently prosecuting claims against Jeffrey Epstein on behalf of other victims.
9. All other named victims.
10. All persons referenced in Edwards' Motion for Summary Judgment.
11. All witnesses listed by the Counterdefendant and Co-Defendant.
12. All experts named by the Counterdefendant and Co-Defendant.
13. Any and all witnesses whose names appear in depositions, interrogatories, or requests for production provided by Bradley J. Edwards.
14. Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.


EXPERTS

Experts include all listed witnesses involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females.

Counterplaintiff reserves the right to amend this list prior to trial upon proper notice to the Counterdefendant.

Epstein v. Rothstein, et al
Amended Witness List of Bradley J. Edwards
Case No.: 502009CA040800XXXXMBAG

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
E-Service on this 25th day of June, 2013 to all counsel on the attached list.



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IN THE CIRCUIT COURT OF THE
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JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

AMENDED EXPERT WITNESS LIST OF BRADLEY J. EDWARDS

Bradley J. Edwards, by and through his undersigned attorneys, hereby amends his expert witness list for trial as follows:

Experts include all listed attorneys involved in the prosecution of civil claims against Jeffrey Epstein arising out of Epstein's serial abuse of minor females.

They will testify based upon their background, training, and experience as civil litigators, and the personal involvement that each had in prosecuting claims against Jeffrey Epstein, about the legal and ethical propriety of the actions taken by Bradley Edwards in fulfilling his obligations to the victims of Epstein's criminal assaults.

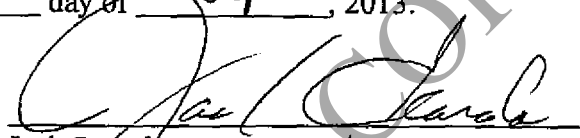
All expert witnesses timely listed by Jeffrey Epstein, subject to Edwards' objections.

Impeachment and rebuttal witnesses as necessary, without waiving any objections thereto.

Edwards adv. Epstein
Amended Expert Witness List
Case No.: 502009CA040800XXXXMBAG

Bradley J. Edwards reserves the right to amend this list prior to trial upon proper notice to counsel for Jeffrey Epstein.

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 27th day of Sept., 2013.



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Attorneys for Jeffrey Epstein

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

OBJECTIONS TO JEFFREY EPSTEIN'S TRIAL EXHIBITS

Bradley J. Edwards files objections to Jeffrey Epstein's Exhibit List dated June 20, 2013,
as follows:

INDEX TO OBJECTIONS

NO: No Objection
AO: All Objections
R&M: Relevance & Materiality
H: Hearsay

1.	Information Charging Scott W. Rothstein in United States of America v. Scott W. Rothstein, 09-60331-CR-COHN; dated December 1, 2009	R&M; H
2.	Plea Agreement between United States of America and Scott W. Rothstein, 09-60331-CR-COHN; filed December 1, 2009	NO

Edwards adv. Epstein

Case No.: 502009CA040800XXXXMBAG

Objections to Jeffrey Epstein's Trial Exhibits

3.	Amended Complaint in Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al., in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943(19); Lawsuit filed November 20, 2009	AO
4.	All Depositions taken of Scott W. Rothstein in In re: Rothstein Rosenfeldt Adler, P.A.; 09-34791-RBR	H (except as to that portion of the deposition taken in this matter)
5.	The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012	AO
6.	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in In re: Rothstein Rosenfeldt Adler, P.A.; 09-34791-RBR	AO
7.	Docket from Doe v. United States, 08-80736-CIV-MARRA	NO
8.	Any and all exhibits listed and/or used by Bradley J. Edwards	NO
9.	Videotaped Deposition of Bradley J. Edwards, including all exhibits used/referenced therein, which was taken by Epstein on May 15, 2013	AO except Hearsay
10.	All documents provided to date by Bradley J. Edwards	AO
11.	Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by	AO

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Objections to Jeffrey Epstein's Trial Exhibits

	Bradley J. Edwards, including all exhibits marked at said depositions	
12.	All of Edwards' Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions	AO
13.	Complaints and Docket from L.M. v. Jeffrey Epstein; 09-CIV-81092-COHN; and 502008CA018051XXXXMB	NO
14.	Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein	NO
15.	Subpoena to Leonard Baird	NO
16.	Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.	NO
17.	The Defendants reserve the right to produce any newly discovered evidence upon proper notice	AO
18.	The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal	AO
19.	The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice	AO
20.	All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection	AO

Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Objections to Jeffrey Epstein's Trial Exhibits

	at the offices of the undersigned at a mutually convenient time and date	
--	--	--

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 20th day of September, 2013.



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Edwards adv. Epstein
Case No.: 502009CA040800XXXXMBAG
Objections to Jeffrey Epstein's Trial Exhibits

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Attorneys for Jeffrey Epstein

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

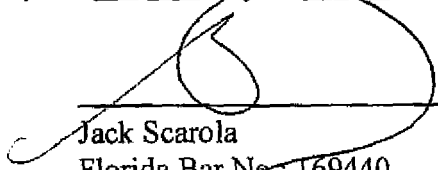
Defendant(s).

NOTICE OF FILING DEPOSITION DESIGNATIONS FOR USE AT TRIAL

Bradley J. Edwards, by and through his undersigned counsel, hereby designates the following depositions for use at trial:

3/17/10 Jeffrey Epstein
1/25/12 Jeffrey Epstein
6/14/12 Scott Rothstein

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 27th day of Sept., 2013.



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JEFFREY EPSTEIN,

Plaintiff,

vs.

SCOTT ROTHSTEIN, individually,
BRADLEY J. EDWARDS,
Individually, and L.M., individually.

Defendants.

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO. 502009CA040800XXXXMBAG

**JEFFREY EPSTEIN'S NOTICE OF SERVING
TRIAL EXHIBIT AND WITNESS LIST**

Plaintiff/Counter-Defendant Jeffrey Epstein, by and through his undersigned counsel, hereby certifies that the original list of trial exhibits, trial witnesses, and expert witnesses pursuant to the Court's Order date April 2, 2013 was served upon Defendant/Counter-Plaintiff via electronic service this June 24, 2013.

/s/ Tonja Haddad Coleman

Tonja Haddad Coleman, Esq.

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JEFFREY EPSTEIN,
Plaintiff,

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT IN
AND FOR PALM BEACH COUNTY,
FLORIDA

vs.

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

CASE NO.: 502009CA040800XXXXMBAG

JUDGE: CROW

Defendants.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S LIST OF TRIAL
EXHIBITS, TRIAL WITNESSES AND EXPERT WITNESSES PURSUANT TO
THE COURT'S ORDER DATED APRIL 2, 2013**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his list of trial exhibits, trial witnesses, and expert witnesses pursuant to this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures dated April 2, 2013 as follows:

TRIAL EXHIBITS

1. Information Charging Scott W. Rothstein in *United States of America v. Scott W. Rothstein*, 09-60331-CR-COHN; dated December 1, 2009.
2. Plea Agreement between *United States of America and Scott W. Rothstein*, 09-60331-CR-COHN; filed December 1, 2009.
3. Amended Complaint in *Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.*, in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943 (19); Lawsuit filed November 20, 2009.
4. All Depositions taken of Scott W. Rothstein in *In re: Rothstein Rosenfeldt Adler, PA*; 09-34791-RBR.
5. The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012.

6. Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in *In re: Rothstein Rosenfeldt Adler, P.A.*; 09-34791-RBR.

7. Docket from *Doe v. United States*, 08-80736-CIV-MARRA.

8. Any and all exhibits listed and/or used by Bradley J. Edwards.

9. Videotaped Deposition of Bradley J. Edwards, including all exhibits used/referenced therein, which was taken by Epstein on May 15, 2013.

10. All documents provided to date by Bradley J. Edwards.

11. Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by Bradley J. Edwards, including all exhibits marked at said depositions.

12. All of Edwards's Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions.

13. Complaints and Docket from *L.M. v. Jeffrey Epstein*; 09-CV-81092-COHN; and 502008 CA 018051 XXXXMB.

14. Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein.

15. Subpoena to Leonard Baird.

16. Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.

The Defendants reserve the right to produce any newly discovered evidence upon proper notice.

The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal.

The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice.

All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection at the offices of the undersigned at a mutually convenient time and date.

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Address unknown at this time
47. Maribel Matiska
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51. Ronald Wise

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57. Scott Goldstein
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58. Alfredo Rodriguez (anticipated release date November 2013)
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72. Any and all witnesses listed by Bradley J. Edwards.
73. Any and all witnesses whose names appear in depositions, interrogatories,
or requests for production provided by Bradley J. Edwards.

Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice.

Epstein reserves the right to call and/or produce any and all witnesses necessary for impeachment or rebuttal.

Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the Parties and this Court.

EXPERT WITNESSES

Unknown at this time, but Epstein will amend upon proper review of all documents and discovery in this matter.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served upon all parties listed below, via Electronic Service, this June 20, 2013.

/s/ Tonja Haddad Coleman
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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT,
IN AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

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

Defendants/Counter-Plaintiff,

EPSTEIN'S OBJECTIONS TO EDWARDS'S REVISED EXHIBIT LIST

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph D4 of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, hereby objects to the following of Defendant/Counter-Plaintiff Bradley Edwards's trial exhibits (numbered in order as they appeared in Edwards's Revised Exhibit List):

1. All applicable criminal statutes
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 "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"
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
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 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
42. All discovery related responses of Jeffrey Epstein in 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
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 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

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
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 (this item not numbered on Edwards's Trial Exhibit Listt)
65. MC2 emails involving communications of Jeffrey Epstein, Jeff Puller, 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 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
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 5th 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
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
132. Curriculum vitae of Dr. Ryan Hall

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. Demlison 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. Demonstrative aids and exhibits including, but not limited to, anatomical charts, diagrams and models, surveys, photographs and similar material including blow-ups of the foresaid items.- need to see before we agree
143. Any and all mortality tables
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's Motion for Summary Judgment.
151. All time records and hourly billing documentation produced in discovery.
152. All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.
153. All Settlement Agreements between Epstein and victims of his sexual molestations.

Epstein objects to all of the afore-referenced Exhibits on several grounds, including, *but not limited to*: Relevance; Prejudice; Confusion; Misleading; Hearsay; Impermissible/Inadmissible Character Evidence; Impermissible/Inadmissible Evidence of other Crimes, Wrongs, or Acts; and the fact that most of the items on this list were not

provided to Epstein through discovery or otherwise *in this case*, in direct violation of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, and Epstein's "Exhibit A" to Bradley J. Edwards's Deposition *Duces Tecum*.

By listing these grounds for objection to the afore-listed Exhibits, Epstein is not waiving his right to assert additional objections, or objections to any non-listed Exhibits at trial.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this September 19, 2013.

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

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

Defendants/Counter-Plaintiff,

REVISED NOTICE OF FILING DEPOSITION
DESIGNATIONS FOR USE AT TRIAL

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his
undersigned counsel hereby designates the following depositions for use at trial:

3/23/2010 Bradley Edwards

5/15/2013 Bradley Edwards

12/12/2011 Scott W. Rothstein

6/14/2012 Scott W. Rothstein

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served,
via electronic service, to all parties on the attached service list, this September 27, 2013.

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN
AND FOR PALM BEACH COUNTY,
FLORIDA

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

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

Defendants/Counter-Plaintiff,

EPSTEIN'S OBJECTIONS TO EDWARDS'S DEPOSITION DESIGNATIONS

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph M of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, hereby objects to certain portions of the following of Defendant/Counter-Plaintiff Bradley Edwards's deposition designations, and to save space is listing only the portions to which he does ***not object***, as nearly all of the questioning directed to Mr. Epstein was unrelated to this case. The grounds for the objections are discussed fully below.

1. March 17, 2010 deposition of Jeffrey Epstein

Counsel does *not object* to the following, relevant portions of Epstein's first deposition:

Page 13; Lines 11-21

Page 23; Lines 4-19

Page 23; Lines 4-19
Page 25; Lines 9-25
Page 26; Lines 6-15
Page 28; Lines 14-25
Page 30; Lines 6-18
Page 33; Lines 1-3
Page 34; Lines 7-22
Page 36; Lines 10-25
Page 38; Lines 1-22
Page 48; Lines 13-25
Page 49; Lines 24-25
Page 50; Lines 1-4
Page 50; Lines 8-25
Page 52; Lines 10-
Page 59; Lines 11
Page 63; Lines 4-25
Page 90; Lines 10-15
Page 116; Lines 8-15
Page 120; Lines 16-24
Page 126; Lines 1-5

2. January 25, 2012 deposition of Jeffrey Epstein

Counsel does *not object* to the following, relevant portions of Epstein's second deposition:

Page 17; Lines 12-15
Page 19-20; Lines 16-25 and Lines 1-22
Page 21; Lines 1-6

Epstein objects to the use of any testimony contained in each of the afore-referenced depositions that is not listed above, as it is neither relevant to, nor directly related to, Edwards's causes of action for Abuse of Process and Malicious Prosecution. The non-listed testimony and questioning from these depositions is salacious and replete with inflammatory and unnecessary lines of questioning related to criminal investigations or charges related to Epstein. Allowing the jury to hear this irrelevant portion of the depositions is improper, as it is being offered as "relevant solely to prove bad character"

and would unduly inflame and prejudice the minds of the jury against Epstein. § 90.404(2) (a) FLA. STAT. (2013). Epstein further makes his objections to all of the non-listed Epstein deposition testimony on the following grounds: Relevance; Prejudice; Confusion; Misleading; Impermissible/Inadmissible Character Evidence; Impermissible/Inadmissible Evidence of other Crimes, Wrongs, or Acts; and Attorney-Client Privilege. See § 90.403 FLA. STAT. (2013); § 90.502 FLA. STAT. (2013); § 90.404(2) (a) FLA. STAT. (2013).

By listing these grounds for objection, Epstein is not waiving his right to assert additional objections, or objections at trial.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this October 14, 2013.

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