

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

JEFFREY EPSTEIN,

Complex Litigation, Fla.R.Civ.Pro. 1.201

Case No. 502009CA040800XXXXMBAG

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiffs.

**PLAINTIFF/COUNTER-DEFENDANT, JEFFREY EPSTEIN'S RESPONSE TO
DEFENDANT/COUNTER-PLAINTIFF, BRADLEY J. EDWARDS' REQUEST FOR
ADMISSIONS AND INTERROGATORY DATED SEPTEMBER 16, 2010**

Plaintiff, Counter-Defendant, Jeffrey Epstein, by and through his undersigned counsel, and files this his Response to Request for Admissions and Answer to Interrogatory of Defendant/Counter-Plaintiff, Bradley J. Edwards, pursuant to Florida Rule of Civil Procedure 1.370 and states as follows:

EPSTEIN'S RESPONSE TO EDWARDS' RFA

1. Epstein objects to the Request for Admissions because the total, including subparts exceeds thirty (30) requests. Florida Rules of Civil Procedure 1.370(a).
2. There are in excess of sixty (60) Requests for Admissions including subparts.
3. In addition to the objections above, with regards to Paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, the Plaintiff/Counter-Defendant objects to these requests on the grounds that they are

irrelevant, burdensome, propounded for the purpose of harassment, and require information which would be protected by the Fifth Amendment of the U.S. Constitution.

4. In addition to the objection in Paragraph 1, with regard to Request for Admissions in Paragraphs 13, 14, 15, and 22, the Plaintiff/Counter-Defendant objects on the grounds that the requests are irrelevant and propounded for the purpose of harassment.

5. In addition to the objection in Paragraph 1, with regard to Paragraphs 16, 17, 18, 19, the Plaintiff/Counter-Defendant objects on the grounds are irrelevant, propounded for the purpose of harassment, and the response would require the Plaintiff/Counter-Defendant to disclose attorney-client work product communications.

6. In addition to the objection in Paragraph 1, with regard to the Request for Admissions in Paragraph 25, 28, and 29, the Plaintiff/Counter-Defendant objects on the grounds that the requests are irrelevant, overbroad and propounded for the purpose of harassment.

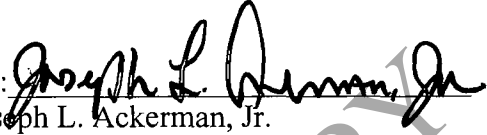
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been duly furnished via ☐ Email, ☐ Facsimile, ☒ U.S. Mail, ☐ Hand Delivery, ☐ Federal Express this 18th day of October, 2010 to:

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