

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

Case No. 50-2009CA040800XXXXMBAG
(Severed Claim; Epstein v. Rothstein)

JEFFREY EPSTEIN,

Plaintiff,

v.

SCOTT ROTHSTEIN, et al.,

Defendants.

**PLAINTIFF'S NOTICE OF TAKING VIDEOTAPED DEPOSITION DUCES TECUM
IN THE EPSTEIN V. ROTHSTEIN SEVERED CLAIM**

YOU ARE HEREBY NOTIFIED that on April 25, 2019, at 9:30 a.m. at Link & Rockenbach, PA, 1555 Palm Beach Boulevard, Suite 930, West Palm Beach, Florida 33401, Plaintiff Jeffrey Epstein will take the videotaped deposition by oral examination for purposes of discovery and for use as evidence in said cause, or both, of:

JEAN-LUC BRUNEL

The videotaped deposition will be taken before a court reporter, a Notary Public, or any officer authorized to administer oaths by the laws of the state where the deposition is conducted, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action. The deposition will continue from day to day until complete.

Pursuant to Florida Rule of Civil Procedure, this puts you on notice that court reporting services will be provided by Palm Beach Reporting Service (1665 Palm Beach Lakes Boulevard, Suite 1001, West Palm Beach, Florida 33401; 561-471-2995) and the video equipment will be

operated by Visual Evidence (601 N. Dixie Highway, Suite A, West Palm Beach, Florida 33401; 561-655-2855).

The witness has been directed to bring the documents identified in the Subpoena Duces Tecum attached as **Exhibit 1**.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on April 4, 2019, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 930
West Palm Beach, Florida 33401
(561) 847-4408; (561) 855-2891 [fax]

By: /s/ Scott J. Link
Scott J. Link (FBN 602991)
Kara Berard Rockenbach (FBN 44903)
Primary: Scott@linkrocklaw.com
Primary: Kara@linkrocklaw.com
Secondary: Tina@linkrocklaw.com
Secondary: Troy@linkrocklaw.com

Counsel for Plaintiff Jeffrey Epstein

SERVICE LIST

Marc S. Nurik Law Offices of Marc S. Nurik 1075 Broken Sound Parkway, Suite 102 Boca Raton, FL 33487 <u>marc@nuriklaw.com</u> <i>Counsel for Defendant Scott Rothstein</i>	Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <u>jgoldberger@agwpa.com</u> <u>smahoney@agwpa.com</u> <i>Co-Counsel for Plaintiff Jeffrey Epstein</i>
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EXHIBIT 1

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG
(Severed Claim; Epstein v. Rothstein)

JEFFREY EPSTEIN,

Plaintiff,

v.

SCOTT ROTHSTEIN, individually,

Defendant.

SUBPOENA DUCES TECUM FOR VIDEOTAPED DEPOSITION

THE STATE OF FLORIDA TO:

TO: Jean-Luc Brunel
c/o Joe Titone
621 S.E. Fifth Street
Pompano Beach, FL 33060

YOU ARE COMMANDED to appear before a person authorized by law to take depositions on **April 25, 2019, at 9:30 a.m.** at Link & Rockenbach, PA, 1555 Palm Beach Boulevard, Suite 930, West Palm Beach, Florida 33401, for the taking of your videotaped deposition in this action. If you fail to appear, you may be in contempt of court.

You are subpoenaed to appear by the following attorneys, and unless excused from this Subpoena by the attorneys or the Court, you shall respond to this Subpoena as directed.

You are further directed to produce to Plaintiff's counsel by **April 18, 2019**, the documents identified in the attached Exhibit "A."

Dated: April 4, 2019.

LINK & ROCKENBACH, P.A.
1555 Palm Beach Lakes Boulevard, Suite 930
West Palm Beach, Florida 33401
(561) 847-4408; (561) 855-2891 [fax]

By: /s/ Scott J. Link

Scott J. Link (FBN 602991)

Kara Berard Rockenbach (FBN 44903)

Primary: Scott@linkrocklaw.com

Primary: Kara@linkrocklaw.com

Secondary: Tina@linkrocklaw.com

Secondary: Troy@linkrocklaw.com

Counsel for Plaintiff Jeffrey Epstein

If you are a person with a disability who needs any accommodation in order to respond to this Subpoena, you are entitled, at no cost to you, to the provision of certain assistance. Please contact Link & Rockenbach, 1555 Palm Beach Lakes Boulevard, Suite 930, West Palm Beach, Florida 33401 (561) 847-4408, at least seven days before your scheduled appearance, or immediately upon receiving this notification if the time before the scheduled appearance is less than seven days; if you are hearing or voice impaired, call 711.

Copies provided to:

SERVICE LIST

Marc S. Nurik Law Offices of Marc S. Nurik 1075 Broken Sound Parkway, Suite 102 Boca Raton, FL 33487 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i>	Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff Jeffrey Epstein</i>
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EXHIBIT A

DEFINITIONS

A. The terms “you” and “your” refer to Jean-Luc Brunel and entities owned or controlled by him, and his agents, representatives, assigns, attorneys or other person or entity acting or purporting to act on his behalf.

B. An entity is deemed to be owned by you if you directly or indirectly hold 25% or more of the ownership interests, and an entity is deemed to be controlled by you if, through ownership of voting interests, by contract or through other understandings or arrangements, you have the ability to direct in any meaningful respect the manager and affairs of the entity.

C. Entities owned or controlled by you shall include, without limitation, MC2 Models Management, LLC, MC2 Models Miami, LLC, Scouting International Investment Co., Ltd., Scouting I International Co. and L'éclair au Café Limited Liability Company, and all present or former entities, affiliates, subsidiaries, parents and assigns of each.

D. The word “communication(s)” shall mean any oral or written statement or exchange of information of any type between two or more persons or entities, including but not limited to documents, facsimiles, e-mails, instant messages, text messages, telephone or face-to-face conversations, meetings or conferences. Communications also includes any enclosures or attachments.

E. The word “document” shall include all written, printed, typewritten, electronically stored, recorded or graphic matter, photographic matter or sound reproduction, including, without limitation, drawings, graphs, charts, photographs, sound recordings, images, correspondence, reports, tests, analyses, memoranda, contracts, agreements, notes, notebooks, work papers, charts, graphs, projections, financial models, diaries, calendars, appointment books, schedules, travel and expense reports, studies, checks, invoices, statements, receipts, bulletins, computer print-outs, e-mails, social media communication or posts, text and instant messages, interoffice and intraoffice communications, applications, tax records, notations of conversations or meetings, transcripts of any kind (including transcripts of conference calls or television appearances), video and voice recordings and every other data compilation on which or through which information of any type can be obtained, translated if necessary into reasonably usable form, which are in the possession, custody or control of you or your counsel. “Documents” shall include originals, all drafts and copies that differ in any respect from the original, and any material recorded in verbal, graphic, computer, telecommunicative, or magnetic form, or any other form capable of being read, heard or otherwise understood. The word “document” has the broadest meaning possible, including but not limited to all reasonably available electronically stored information. You are requested to produce electronically stored information in the form in which it is ordinarily maintained or in a reasonably usable form or forms. If a document was attached to an e-mail, produce the accompanying e-mail thread.

F. “Communications” and “documents” specifically include all electronically stored information (“ESI”) or related data which includes, but is not limited to, electronically stored data on magnetic or optical storage media; documents and emails stored in networked, web, or cloud

servers (such as Google Mail); network or social media accounts; text or other messages stored on electronic devices, including cellular phones, computers, tablets, etc.; and “active” file(s) (readable by one or more computer applications or forensics software). If relevant metadata such as author and creation data are visible on an ESI document, you are requested to produce the ESI document as a bates-stamped text-search PDF; otherwise, you are requested to produce the ESI document in native format.

G. The phrases “related to” or “concerning” shall mean refer to, contain, allude to, respond to, comment upon, discuss, show, disclose, explain, mention, analyze, constitute, comprise, evidence, set forth, summarize, support, refute or characterize, either directly or indirectly, in whole or in part.

H. All words in the present tense include the past tense and all words in the past tense include the present tense. All words used in singular form include plural form and all words used in plural form include singular form.

I. The words “and” and “or” as used herein shall be construed either disjunctively or conjunctively as required by the context to bring within the scope of these requests any answer that might be deemed outside its scope by another.

J. Any reference to any individual or entity includes their partners, members, managers, officers, directors, agents, employees, independent contractors, representatives, assigns, attorneys, affiliates or other persons or entities acting or purporting to act on their behalf.

K. The “relevant period” means January 1, 2007 to the present unless stated otherwise in a request.

REQUESTED DOCUMENTS

1. All documents relating to any corporation, partnership, limited liability company or other entity in which you hold an interest including, but not limited to:
 - a. Articles of Incorporation, Bylaws, Minute Books, Stock Books, Stock Transfer Records and Annual Reports.
 - b. All financial statements, credit applications, lease applications, loan applications, financial affidavits and financial representations which were prepared for or submitted by you personally or on your behalf or on behalf of any entity directly or indirectly owned by or controlled by you at any time during the relevant period.
 - c. All Forms W-2, Forms 1099 and any other documents reflecting any income (including salary, bonuses, profit distributions, and any other form of income), compensation, remuneration or revenue, including all gross and net revenue received by you directly or indirectly from any entity owned or controlled by you at any time during the relevant period.

- d. All bank statements, brokerage statements, securities statements, money market account statements, commodities account statements, securities account statements, mutual fund statements, annuities statements, whole life insurance statements, financial account statements, financial institution statements, transaction statements, accounts receivable statements, loan statements, lease statements, credit card statements, revolving credit statements, accounts payable statements which were prepared by or received during the relevant period by you, or on your behalf or by or on behalf of any entity owned or controlled by you at any time during the relevant period.
- e. The most recent bank ledger sheets or other financial account ledger sheets (including, without limitation, brokerage accounts, securities accounts, commodities accounts, margin accounts, money market accounts, mutual fund accounts, annuities accounts, retirement accounts, financial instrument accounts) in your possession, or accessible by you on the internet, with respect to all such accounts in which at any time during the relevant period you had or any entity owned by or controlled by you had a right to withdraw funds.
- f. All records pertaining to the sale, transfer, exchange or other disposition at any time during the relevant period of any money or property interests or financial interests of any type, nature or description, whether for or without consideration, made by you or on your behalf, or by or on behalf of any entity owned or controlled by you at such time.
- g. All records indicating any and all income, compensation, remuneration, revenue, reimbursement, benefits and all other things with a fair market value of \$1,000 or more received from any and all sources at any time during the relevant period in question directly or indirectly by you from any entity owned or controlled by you or for which during such time you served in any representative capacity.
- h. All records indicating any and all income, compensation, remuneration, revenue, reimbursement, benefits and all other things with a fair market value of \$1,000 or more received from any and all sources at any time during the relevant period in question directly or indirectly by any entity owned or controlled by you or for which during such time you served in any representative capacity.
- i. All tax returns, including, without limitation, federal, state, local or foreign tax returns and including, without limitation, all such returns relating to taxes on income, wealth, sales, use, personal, VAT, gifts, withholding, foreign accounts, foreign assets, transfers, stamps, real estate transfers, payments to contractors, trusts, small business corporations, corporations, partnerships, limited liability company, and charitable organizations ("Taxes") filed with any taxing entity during the relevant period by you or on your behalf, or on behalf of any entity owned by you or controlled by you at the time of filing. Include all schedules, worksheets and supporting documents relied upon, used or prepared in connection such returns.

2. All documents evidencing travel from January 1, 2004, to the present including, but not limited to, passports, itineraries, plane tickets, lodging receipts, transportation receipts, and calendar entries.

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