

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 ADDITIONAL 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

S SPECULATION

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		

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			

[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			

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		60:24-61:1 Rule 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		152:11-153:14 R, LP	
205:9-22		205:9-22 R, LP	
206:10-207:8			
	207:9-208:1		

	208:7-209:13		
	215:18-24		
	216:11-14		

4. Jeffrey Epstein; March 17, 2010

[illegible]

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			

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
68:24-69:8		68:24-69:8 R	
69:21-22		69:21-22 R	
69:24		69:24 R	
70:17-71:22		70:17-70:20 R	
		71:5-71:22 R, LP	
76:8-77:20		76:8-77:20 R, LP	
79:10-24		79:10-24 R, LP	
80:12-23		80:12-23 O,S,R,LP	
83:2-16		83:2-16 R, LP	
85:18-23		85:18-23 R	
86:4-89:10		86:4-89:10 R, LP	
92:4-93:14			
94:3-15		94:3-94:15 R	
95:1-20		95:1-95:4 R	
98:21-99:22		98:21-99:22 R	
104:4-12		104:4-104:12 R	
105:7-107:11	107:9-11	105:7-105:25 R	
	109:15-19		
110:12-19			
110:21-111:12		110:21-111:12 R	
112:3-12		112:3-12	
	114:9-15		
115:10-116:19		115:10-116:19R LP	
	116:9-10		
	116:12-13		
	116:24-25		
	117:1-2		
	117:5-6		
	117:12-13		
117:14-118:2	117:25-118:2	117:14-118:2RLPH	
118:14-120:4		118:14-120:4 R LP	
	121:4-122:15		
	122:23-124:7		

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

***BRADLEY J. EDWARDS OBJECTS TO USE OF THE ENTIRE DEPOSITION AS HEARSAY. ALL IRRELEVANT AS POST-FILING INFORMATION THAT CANNOT SUPPORT P.C. ADDITIONAL OBJECTIONS ARE SEPARATELY NOTED.**

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:14-5:12	4:8-11		

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
63:10-25			
	65:15-66:6		
	66:11-20		
	72:13-73:1		
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		101:19-102:7 403	
103:12-104:21			
106:4-23		106:4-107:4 R	
106:25-107:4			
107:15-23		107:15-23 R	
108:1-5		108:1-3 R	
		108:4-5 R, 403	
115:6-120:9			
121:8-123:17			
124:20-126:14			
	151:22-152:22		

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

***EDWARDS OBJECTS TO THE USE OF THIS ENTIRE DEPOSITION AS HEARSAY ALSO TESTIMONY GIVEN ON 10/28/10 IS IRRELEVANT TO ESTABLISHING P.C. FOR SUIT FILED ON 12/7/09. ADDITIONAL OBJECTIONS NOTED.**

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:1-5:10		4:23-5:12 R	
9:5-12:14		9:5-12:14 R	
16:22-20:12		16:22-20:12 R	
22:9-24:22		22:9-26:20 R	
25:3-26:20			
39:9-51:5		39:9-41:10 R	

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

10. Dean Russell Kretschmar; February 11, 2011: Entire transcript

BRADLEY J. EDWARDS OBJECTS TO USE OF THE ENTIRE DEPOSITION AS HEARSAY. ALSO ALL TESTIMONY IS IRRELEVANT SINCE INFORMATION GATHERED ON 2.11.11 COULD NOT POSSIBLY ESTABLISH P.C. FOR ACTION FILED ON 12.7.09.

11. Michael Legamaro; March 11, 2011

ALL TESTIMONY IS IRRELEVANT SINCE INFORMATION GATHERED ON 3.11.11 COULD NOT POSSIBLY CONTRIBUTE TO ESTABLISHING P.C. FOR AN ACTION FILED ON 12.7.09

Designation	Completeness/Counter /Cross Designation	Objections	Response to Objections
4:10-11			
	4:12, 4:14-15		
	4:19-24		
	5:6-5:12		
	5:19-5:21		
9:21-22	9:21-22		
11:2-9			

11:22-12:17	11:24-12:17		
13:7-14:1	13:7-14:1		
14:22-15:5			
15:16-19:2	15:22-17:10		
	17:20-19:2		
19:21-24:15	19:21-21:8		
	22:6-22:15		
	23:9-24:18		
25:6-26:7			
	26:18-25		
27:11-28:25	27:17-30:3		
29:7-20			
30:10-31:9	30:10-23		
	31:2-32:2		
	32:17-33:2		
	34:10-13		
	34:18-21		
	34:24-35:6		
	38:17-39:1		
	41:21-44:5		
	44:19-45:2		
	45:5-6		
	45:13-16		
	45:19-46:4		
45:22-46:4			
46:24-47:10	46:24-47:7		
47:14-51:1		48:22-25 O	
	49:1-50:13		
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	65:18-66:2		
67:16-23			
	120:2-8		
	120:21-24		
	121:1-5		
	132:20-21		
	133:25-134:20		

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			

[illegible]

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 15th day of December, 2017.



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