

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

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

Complex Litigation  
Fla.R.Civ.Pro. 1201- Civil – Div.

Case No. 502009CA040800XXXXMB

Judge: AG – David Crow

SHARON JACK, CLERK  
PALM BEACH COUNTY, FL  
CIRCUIT COURT  
10 DEC 30 AM 9:13

**PLAINTIFF, JEFFREY EPSTEIN'S MOTION FOR PROTECTIVE  
ORDER RELATING TO DEPOSITION OF ROBERT CRITTON**

Plaintiff, Jeffrey Epstein (“Epstein”), by and through his undersigned representative and pursuant to the Florida Rules of Civil Procedure file this his Motion for Protective Order Relating to the Deposition of Robert Critton for the reasons set forth below:

1. The Plaintiff has presently scheduled the deposition of Robert Critton in this matter for January 10, 2011.

2. The undersigned counsel is unavailable that day due to specially set trials in the case of *Penelope Lankheim v Florida Atlantic University*, beginning January 10<sup>th</sup> through January 12<sup>th</sup>, 2011 before Judge Rosenberg and the case of *Toll Bros., Inc. v. The Decorators Unlimited, Inc. and Nationwide Mutual Insurance Company*, January 13<sup>th</sup> through January 18, 2011 before Judge Sasser.

3. The undersigned has requested counsel for the Defendant to reschedule the deposition but has not obtained or received a response.

4. The undersigned counsel certifies that this motion is made in good faith and not for the purpose of delay.

5. The undersigned counsel certifies that he has and will continue to make an effort to resolve this matter without the need of a hearing.

WHEREFORE, Plaintiff, Jeffrey Epstein, respectfully requests that this court enter an order preventing the deposition of Robert Critton from occurring in this matter on January 10, 2011 and requiring it to be rescheduled at a time mutually convenient to the witness and counsel for all parties.

**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 29<sup>th</sup> day of December, 2010 to:

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