

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.

MOTION FOR PROTECTIVE ORDER

COMES NOW Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. (FJW) and Gary M. Farmer, Jr., Steven R. Jaffe, Matthew D. Weissing, Mark S. Fistos and Seth M. Lehrman individually, through counsel and pursuant to Florida Rule of Civil Procedure 1.280(c), and hereby file this Motion for Protective Order regarding the documents and information sought by Plaintiff Jeffrey Epstein in the Deposition Duces Tecum served on Bradley J. Edwards, and as grounds states as follows:

1. EPSTEIN served a Notice of Deposition Duces Tecum on Bradley Edwards, requesting documents and information that are clearly protected by attorney-client and work product privilege and/or which are the private property of FJW or their clients or request information that is not reasonably calculated to lead to the discovery of admissible evidence.

2. The FJW firm and its individual members move for the entry of a Protective Order related to the subpoena duces tecum served upon Brad Edwards.

3. Movants have been apprised of a recently issued subpoena duces tecum served by Jeffrey Epstein upon Brad Edwards personally. The request infringes upon the privacy rights of FJW and FJW's members all of whom are non-parties to the litigation.

4. Likewise the request infringes upon the privacy rights of FJW clients, also non-parties to the litigation.

5. Specifically, Epstein has requested Edwards to bring to his deposition copies of FJW tax returns, distributions, schedule K-1s, and any other documents related to gross income of FJW for the past 4 calendar years; copies of all documentation related to all settlements, attorneys' fees awards, jury verdict awards, and arbitration/mediation income of FJW; income tax records for 2013 of FJW; and the FJW partnership agreement.

6. These requests invade the proprietary interests of the law firm, infringe upon the individual privacy rights of each of its members (also non-parties to the suit), as well as the privacy of each of the firms' clients (also non-parties to the suit).

7. As has been Epstein's strategy from the onset of this litigation, he continues to tactically game the system in order to harass Edwards and FJW, despite the fact that his requests bear no relevance whatsoever to the pending action.

8. The information requested of this non-party to the litigation is highly confidential and must be protected from disclosure in this action.

9. In addition to the extreme and unprecedented infringement on the privacy rights of FJW and its members, compliance with such an outrageous request would be overly burdensome and would impact upon the Firm's attorney-client and work-product privileges.

10. If the privacy rights of FJW clients are to be infringed, then FJW will be required to undertake the onerous task of locating and notifying those clients that their claims, recoveries

and other personal information is being disclosed to Jeffrey Epstein, a known pedophile, as well presumably to other unknown and unidentified third parties.

11. The affected FJW clients must be afforded the opportunity to appear and be heard. why their private information should not be disclosed/revealed to third parties.

12. Safeguards and Court Orders will have to be created and put in place on a case by case basis to ensure that information which has previously been private is protected against public disclosure, dissemination to unauthorized persons, inclusion in databases, or other invasions of the privacy of the uninvolved clients.

13. Should this Honorable Court determine that disclosure of non-parties' financial information is appropriate, Florida law requires that prior to disclosing that financial information, the Court must perform an In Camera review of all financial information and hold an evidentiary hearing regarding the propriety of disclosing that financial information .

14. The far-reaching discovery and disclosure of the financial information of third parties not involved in this litigation should be prevented.

WHEREFORE, FJW and its members, respectfully move this Court to enter an Order of Protection precluding EPSTEIN from obtaining the discovery he is seeking in his Subpoena Duces Tecum to Bradley Edwards.

CERTIFICATE RE: E-FILING AND E-SERVICE

I HEREBY CERTIFY that this Motion for Protective Order was filed electronically in compliance with Florida Rules of Judicial Administration 2.515 and 2.516(e).

I FURTHER CERTIFY that this Motion for Protective Order was served electronically in compliance with Florida Rule of Judicial Administration 2.516(b)(2)(A) to **the SERVICE LIST**, this 30th day of April, 2013.

I FURTHER CERTIFY for purposes of service of any documents after initial process that staff.efile@pathtojustice.com is primary, no secondary.

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