

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.

---

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S  
RESPONSE TO DEFENDANT/COUNTER-PLAINTIFF  
BRADLEY J. EDWARDS' REQUESTS FOR ADMISSION**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), pursuant to Florida Rule of Civil Procedure 1.370, responds to Defendant/Counter-Plaintiff Bradley J. Edwards' ("Edwards") February 6, 2018, Requests for Admission as follows:

1. The printout of your New York State Sex Offender registration page attached [to the Request] as Exhibit 'A' is authentic.

**RESPONSE**

Epstein cannot admit or deny this request because he has no control over or personal knowledge about the authenticity of the registration attached as Exhibit 'A' to Edwards' Request.

2. The information contained in the printout of your New York State Sex Offender registration page attached [to the Request] as Exhibit 'A' is accurate.

**RESPONSE**

Epstein cannot admit or deny this request because any response would require the disclosure of information which could communicate a statement of fact that is testimonial in nature. *Fisher v. United States*, 425 U.S. 391, 410 (1976). There is a

substantial and reasonable basis for concern that such testimonial statements of fact could reasonably furnish a “link in the chain of evidence” that could be used to prosecute him in future criminal proceedings. *See Hoffman v. United States*, 341 U.S. 479, 486 (1951). Additionally, Epstein cannot respond to this request without waiving his Fifth, Sixth and Fourteenth Amendment Rights as guaranteed by the United States Constitution and Article I, Sections 2, 9 and 16 of the Florida Constitution.

**CERTIFICATE OF SERVICE**

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on February 20, 2018, 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 301  
West Palm Beach, Florida 33401  
(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link  
Scott J. Link (FBN 602991)  
Kara Berard Rockenbach (FBN 44903)  
Angela M. Many (FBN 26680)  
Primary: [Scott@linkrocklaw.com](mailto:Scott@linkrocklaw.com)  
Primary: [Kara@linkrocklaw.com](mailto:Kara@linkrocklaw.com)  
Primary: [Angela@linkrocklaw.com](mailto:Angela@linkrocklaw.com)  
Secondary: [Tina@linkrocklaw.com](mailto:Tina@linkrocklaw.com)  
Secondary: [Troy@linkrocklaw.com](mailto:Troy@linkrocklaw.com)  
Secondary: [Tanya@linkrocklaw.com](mailto:Tanya@linkrocklaw.com)  
Secondary: [Eservice@linkrocklaw.com](mailto:Eservice@linkrocklaw.com)

*Trial Counsel for Plaintiff/Counter-Defendant  
Jeffrey Epstein*

## SERVICE LIST

<p>Jack Scarola Searcy, Denny, Scarola, Barnhart &amp; Shipley, P.A. 2139 Palm Beach Lakes Boulevard West Palm Beach, FL 33409 <a href="mailto:mep@searcylaw.com">mep@searcylaw.com</a> <a href="mailto:jsx@searcylaw.com">jsx@searcylaw.com</a> <a href="mailto:scarolateam@searcylaw.com">scarolateam@searcylaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Nichole J. Segal Burlington &amp; Rockenbach, P.A. Courthouse Commons, Suite 350 444 West Railroad Avenue West Palm Beach, FL 33401 <a href="mailto:njs@FLAppellateLaw.com">njs@FLAppellateLaw.com</a> <a href="mailto:ktb@FLAppellateLaw.com">ktb@FLAppellateLaw.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>
<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 <a href="mailto:brad@epllc.com">brad@epllc.com</a> <a href="mailto:staff.efile@pathtojustice.com">staff.efile@pathtojustice.com</a> <i>Co-Counsel for Defendant/Counter-Plaintiff</i> <i>Bradley J. Edwards</i></p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 <a href="mailto:marc@nuriklaw.com">marc@nuriklaw.com</a> <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Jack A. Goldberger Atterbury, Goldberger &amp; Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 <a href="mailto:jgoldberger@agwpa.com">jgoldberger@agwpa.com</a> <a href="mailto:smahoney@agwpa.com">smahoney@agwpa.com</a> <i>Co-Counsel for Plaintiff/Counter-Defendant</i> <i>Jeffrey Epstein</i></p>	

2012123