

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff(s),

vs.

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

Defendant(s).

/

OBJECTIONS TO JEFFREY EPSTEIN'S TRIAL EXHIBITS

Bradley J. Edwards files objections to Jeffrey Epstein's Exhibit List dated June 20, 2013,
as follows:

INDEX TO OBJECTIONS

NO: **No Objection**
AO: **All Objections**
R&M: **Relevance & Materiality**
H: **Hearsay**

1.	Information Charging Scott W. Rothstein in United States of America v. Scott W. Rothstein, 09-60331-CR-COHN; dated December 1, 2009	R&M; H
2.	Plea Agreement between United States of America and Scott W. Rothstein, 09-60331-CR-COHN; filed December 1, 2009	NO

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3.	Amended Complaint in Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al., in the Circuit Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, Case No. 09-062943(19); Lawsuit filed November 20, 2009	AO
4.	All Depositions taken of Scott W. Rothstein in In re: Rothstein Rosenfeldt Adler, P.A.; 09-34791-RBR	H (except as to that portion of the deposition taken in this matter)
5.	The videotaped deposition and all exhibits as referenced/used in the Deposition of Scott W. Rothstein taken by Epstein on June 14, 2012	AO
6.	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, Dated February 23, 2011 as filed in this matter and in In re: Rothstein Rosenfeldt Adler, P.A.; 09-34791-RBR	AO
7.	Docket from Doe v. United States, 08-80736-CIV-MARRA	NO
8.	Any and all exhibits listed and/or used by Bradley J. Edwards	NO
9.	Videotaped Deposition of Bradley J. Edwards, including all exhibits used/referenced therein, which was taken by Epstein on May 15, 2013	AO except Hearsay
10.	All documents provided to date by Bradley J. Edwards	AO
11.	Transcripts of all depositions taken in the Plaintiff/Counter-Defendant's case in chief and the Counterclaim filed by	AO

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	Bradley J. Edwards, including all exhibits marked at said depositions	
12.	All of Edwards' Answers to Interrogatories, Responses to Requests for Production, and Response to Requests for Admissions	AO
13.	Complaints and Docket from L.M. v. Jeffrey Epstein; 09-CIV-81092-COHN; and 502008CA018051XXXXMB	NO
14.	Subpoena(s)/Notice(s) for Deposition of Donald Trump, Alan Dershowitz, David Copperfield, and Mark Epstein	NO
15.	Subpoena to Leonard Baird	NO
16.	Notices to produce medical records to Charles J. Galecki, M.D., Bruce W. Markowitz, M.D. and Steven R. Alexander, Ph.D.	NO
17.	The Defendants reserve the right to produce any newly discovered evidence upon proper notice	AO
18.	The Defendants reserve the right to produce any exhibits used for impeachment or rebuttal	AO
19.	The Defendants reserve the right to amend and/or supplement this Exhibit List as information becomes available upon proper notice	AO
20.	All exhibits expected to be offered at trial by the Defendants, except those used for impeachment, will be made available for inspection	AO

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	at the offices of the undersigned at a mutually convenient time and date	
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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 20th day of September, 2013.



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