

#291874/mep

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).

MOTION TO DISMISS

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, moves this Honorable Court to dismiss the Complaint against him for failure to state a cause of action and in support thereof would show:

1. the "Introduction" to the Amended Complaint is nothing more than conclusory surplusage apparently intended to defame Mr. Edwards under the protection of the litigation privilege;
2. the Amended Complaint fails to identify the "process" alleged to be abusive, on whom it is claimed to have been served, or when it is claimed to have been served;
3. the Amended Complaint fails to articulate a cognizable theory of damages proximately caused by any wrongdoing on the part of Bradley Edwards;
4. the Amended Complaint fails to identify any conduct outside the protection of the litigation privilege which could give rise to any liability on the part of Bradley Edwards;

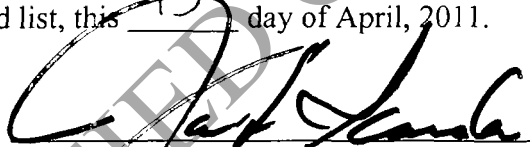
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Edwards adv. Epstein
Edwards' Motion to Dismiss
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5. all legal arguments and authorities as contained in the Defendant's previously filed Motion for Summary Judgment are incorporated by reference.

WHEREFORE, BRADLEY J. EDWARDS, demands dismissal of the Amended Complaint against him.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Fax and U.S. Mail to all Counsel on the attached list, this 15th day of April, 2011.



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