

IN THE CIRCUIT COURT OF THE  
15th JUDICIAL CIRCUIT IN AND  
FOR PALM BEACH COUNTY,  
FLORIDA

JEFFREY EPSTEIN,

Plaintiff,

Complex Litigation, Fla. R. Civ. Pro.1201

Case No. 50 2009CA040800XXXXXAMB AG

v.

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

Defendants.

**NOTICE OF TAKING DEPOSITION- DUCES TECUM\***

**PLEASE TAKE NOTICE** that the undersigned attorney or an attorney of the firm will take the deposition of the following deponent and this deponent is to bring with him the following records on attached Duces Tecum on Schedule "A"

Name: **Records Custodian,  
Herbert Stettin, Trustee in Bankruptcy for RRA**

Date and Time: **Wednesday, March 16, 2011 at 11:00 a.m.**

Place: **Fowler White Burnett, P.A.  
Espirito Santo Plaza  
1395 Brickell Avenue, 14<sup>th</sup> Floor  
Miami, Florida 33131**

Upon oral examination before ORANGE COURT REPORTING, Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purposes of discovery, for the use at trial, or for such other purposes as are permitted under the rules of the Court.

I HEREBY CERTIFY that a true and correct copy of the foregoing was emailed and mailed this 4<sup>th</sup> day of March, 2011 to Jack Scarola, Searcy Denney Scarola Barnhart & Shipley, Attorneys for Bradley J. Edwards, 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409 and Marc S. Nurik, Law Offices of Marc S. Nurik, Attorneys for Scott Rothstein, One E. Broward Blvd., Ste 700, Fort Lauderdale, FL 33301.

Respectfully submitted,

  
Joseph L. Ackerman, Jr.  
Fla. Bar No. 235954  
Christopher E. Knight  
Fla. Bar No. 607363

FOWLER WHITE BURNETT P.A.  
901 Phillips Point, West Tower  
777 South Flagler Drive  
West Palm Beach, FL 33401  
Telephone: (561) 802-9044  
Facsimile: (561) 802-9976

cc: Orange Court Reporting  
(800) 275-7991  
cc: Charles Lichtman, Esquire (w/enclosures)

**EPSTEIN v ROTHSTEIN, EDWARDS**

**SCHEDULE "A"**

**DUCES TECUM/Herb Stettin, Trustee RRA/RC Deposition:**

Any and all employment records for the following employees at Rothstein, Rosenfeldt, Adler, P.A. ("RRA"), that shows her full name, residence address, telephone, social security number, date of birth, application for employment at RRA, I-9 forms, W-4 forms, application(s) for insurance benefits, payroll records and pay stubs, all references/emergency contacts which will include names, addresses and telephone numbers and drivers license information and a photocopy of any documents RRA took a photocopy of with picture ID on the following:

1. Cara L. Holmes
2. Jacqui Johnson
3. Mercedes Estrada
4. Elizabeth Kim
5. Christina Fitch
6. Carl Linder
7. Jonathan Birkman
8. Rob Buschel