

#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 PROPOUND IN EXCESS OF THIRTY REQUESTS FOR ADMISSIONS

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, moves this Honorable Court pursuant to the provisions of Rule 1.340(a), Florida Rules of Civil Procedure, to increase the number of Requests for Admissions permitted herein so as to allow for the filing of admissions in accordance with those attached, and in support of this motion, Defendant/Counterplaintiff would show:

1. The Supreme Court has not approved a form of Request for Admissions for this type of action.
2. The elements of the claims asserted and the nature and complexity of the factual circumstances giving rise to the claims are not susceptible to being adequately covered within the twenty-five (25) Request for Admissions limit.
3. The elements of defenses asserted or expected to be asserted are not susceptible to being adequately covered within the twenty-five (25) Request for Admission limit.

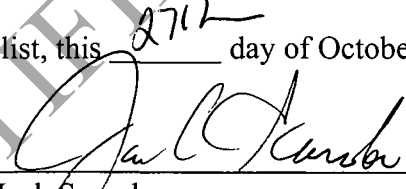
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4. The use of written discovery is the least burdensome, least expensive and most expeditious discovery means available to the Defendant/Counterplaintiff by which to obtain necessary information and narrow trial issues.

5. The Plaintiff/Counterdefendant will not be prejudiced through the granting of this motion.

6. The foregoing factors and others to be presented upon hearing of this Motion constitute good cause for increasing the number of Requests for Admissions permitted herein.

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 27th day of October, 2010.



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