

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).

2011 DEC -5 PM 3:48
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL

FILED

**PLAINTIFF'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES AND
RESPONSE TO REQUEST TO PRODUCE FROM JEFFREY EPSTEIN**

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys, moves this Honorable Court to enter an order compelling Plaintiff/Counterdefendant, JEFFREY EPSTEIN, to answer Interrogatories and respond to a Request to Produce propounded by EDWARDS and states:

1. On October 28, 2011, EDWARDS served by fax and mail on EPSTEIN, certain Interrogatories and Request to Produce, in writing, pursuant to Rule 1.340 of the Florida Rules of Civil Procedure.
2. No answers to these interrogatories or response to request to produce have been served and more than thirty (30) days have elapsed since they were served on EPSTEIN.
3. Movant's counsel certifies that a bona fide effort to agree or to narrow the issues on the Motion noticed hereby has been made with the opposing counsel or that because of time

Edwards adv. Epstein

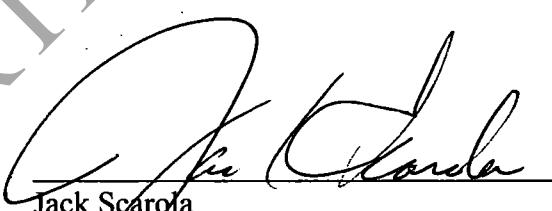
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considerations such effort has not as yet been possible but will be made prior to the date of the hearing.

WHEREFORE, EDWARDS moves for an Order requiring EPSTEIN to answer the interrogatories and respond to the request to produce within ten (10) days from the date of this Order, and providing that if EPSTEIN fails to serve sworn answers within that time be subject to the provisions of Rule 1.380, Florida Rules of Civil Procedure, and a judgment by default entered in favor of EDWARDS, or for such other relief as the Court may deem proper under the laws of the State of Florida and the Florida Rules of Civil Procedure.

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 2nd day of December, 2011.



Jack Scarola
Florida Bar No.: 169440
Searcy Denney Scarola Barnhart & Shipley
2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33409
Phone: (561) 686-6300
Fax: (561) 383-9451
Attorney for BRADLEY J. EDWARDS

Edwards adv. Epstein
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COUNSEL LIST

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, FL 33401
Phone: (561)-659-8300
Fax: (561)-835-8691

Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
Phone: (954)-524-2820
Fax: (954)-524-2822

Joseph L. Ackerman, Jr., Esquire
Fowler White Burnett, P.A.
901 Phillips Point West
777 S Flagler Drive
West Palm Beach, FL 33401-6170
Phone: (561)-802-9044
Fax: (561)-802-9976

Marc S. Nurik, Esquire
One E Broward Blvd., Suite 700
Fort Lauderdale, FL 33301
Phone: (954)-745-5849
Fax: (954)-745-3556