

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
MOTION IN LIMINE AS TO SEX OFFENDER REGISTRY INFORMATION**

Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein"), pursuant to the Court's instruction at recent hearings, moves *in limine* pursuant to section 90.104, Florida Statutes (2017), to preclude Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") trial exhibits relating to sex offender registries that refer to Epstein and states:

INTRODUCTION

Edwards' Second Amended Exhibit List dated December 7, 2017 (D.E. 1109)¹ identifies the following sex offender registry information:

19. All records of homes, properties, bank accounts and any/all records relating to Jeffrey Epstein's assets (sex offender registry information was contained within the documents produced)
63. Jeffrey Epstein's Sex Offender Registrations (from various states)
131. Jeffrey Epstein's NY State Online Sex Offender Registry Profile

¹ A copy of Edwards' December 7, 2017, Second Amended Exhibit List is attached as Exhibit A.

Edwards also asked the Court to take judicial notice of Epstein's New York State Sex Offender registration information. (D.E. 1040.) A copy of Edwards' November 8, 2017, Request for Judicial Notice is attached as Exhibit B.

There is no dispute — Epstein does not deny — that as part of his criminal plea, he pled guilty to one count of an offense that requires him to register as a sexual offender and comply with additional registration related requirements. The Court has already ruled admissible the NPA, pursuant to which Epstein was required to plead guilty to a registrable offense, as well as Epstein's actual plea agreement, which expressly designates Epstein as a sexual offender. Any other materials relating to his status as a sexual offender are cumulative, provide no additional probative value and will tend to unfairly prejudice the jury. Moreover, inasmuch as the offense to which Epstein pled guilty that required him to register as a sexual offender (1) related to a specific individual who was never Edwards' client, and (2) was a procurement offense, i.e., acting as a pimp for that non-Edwards client and receiving money, rather than acting as a john paying money for sexual services, and the allegations of Edwards' three clients expressly relate to Epstein's paying them for sexually related services and not to Epstein acting as their pimp, Epstein's sexual offender registrations have no bearing on the specific claims of Edwards' clients or Edwards' malicious prosecution claim against Epstein as it relates to Edwards' prosecution of his clients' claims. This Motion, therefore, seeks to preclude any testimony (other than the basic fact that, as part of Epstein's plea deal, he agreed to and did comply with all registration requirements as a sex offender) and admission of evidence of *any* sex offender registry documents and information.²

² Sex offender registry information also may be located in other exhibits, such as Epstein's probation file (Ex. 13) or the Palm Beach State Attorney's criminal file against Epstein (Ex. 29).

At the December 5, 2017, hearing, Edwards' counsel initially informed the Court that the sex offender registry information was identified because it contained information about Epstein's assets that he intended to use in the punitive damages phase of the trial. However, the registration does not identify Epstein's net worth. It simply lists automobiles that are owned, an airplane, and identifies already known addresses where Epstein spends time. No values are listed for any of the items. In addition, Edwards has already sought an adverse inference based on Epstein's assertion of the Fifth Amendment to all financial discovery. While the Court stated it would not address evidence pertaining to Epstein's assets "[until] the time comes, if it comes at all," Edwards' counsel then vaguely indicated he may attempt to introduce the sex offender registry information for some other purpose:

MR. SCAROLA: Yes, as part of Mr. Epstein's sex offender registration, particularly in the state of New York -- I'm not sure the extent to which it applies elsewhere -- he was obliged to disclose his ownership interest in vehicles, airplanes and residences, that is, he had to list all of those things. And one of the ways that we have identified Jeffrey Epstein's assets is through those sex offender registration disclosures that he was obliged make and did make.

So it has to do with punitive damages in addition, perhaps, to something else. But it has to do with punitive damages in particular.

(12/5/17 Tr. 202:11-203:3).³

If the sex offender registration contains no net worth information, what possible other relevance could it have? Importantly, the parties have entered into a binding Joint Pretrial Stipulation, framing the issues to be tried based on this Court's rulings. **Exhibit D.** This Court will not find in that joint stipulation any issue relating to the sex offender registration or to any disputed factual issue that the registration documents would tend to prove or disprove for the

³ Excerpts of the December 5, 2017, hearing transcript are attached as **Exhibit C**.

simple reason that it has no relevance in this trial and would create a sideshow constituting reversible error.

ARGUMENT

Epstein's Sex Offender Documents Were Not an Issue on the Joint Pretrial Stipulation, are an Irrelevant Sideshow, and If Allowed, Would Create Reversible Error Based on its Prejudicial Impact

While admissibility of evidence is typically within the trial court's discretion, that discretion is limited by the evidence code and applicable case law. *See Olesky ex rel. Estate of Olesky v. Stapleton*, 123 So. 3d 592, 594 (Fla. 2d DCA 2013). Pursuant to the evidence code, to be admissible at trial, evidence must be relevant *and* not likely to result in unfair prejudice or confusion, or to cause undue delay. §§ 90.402, 90.403, Fla. Stat.

"To be relevant, evidence must tend to prove or disprove a material fact." *Thigpen v. United Parcel Servs., Inc.*, 990 So. 2d 639, 646 (Fla. 4th DCA 2008). Whether Epstein is a registered sex offender has no probative value on any of the issues for trial as stipulated by the parties in the joint pretrial stipulation which now governs. *Broche v. Cohn*, 987 So. 2d 124, 127 (Fla. 4th DCA 2008) ("Pretrial stipulations prescribing the issues on which a case is to be tried are binding upon the parties and the court, and should be strictly enforced.") (citation omitted); *Central Square Tarragon LLC v. Great Divide Ins. Co.*, 82 So. 3d 911, 914 (Fla. 4th DCA 2011) (reversible error when court "impermissibly abandoned the stipulation" and allowed one party to inject a question not listed as a disputed issue in the joint pretrial stipulation).

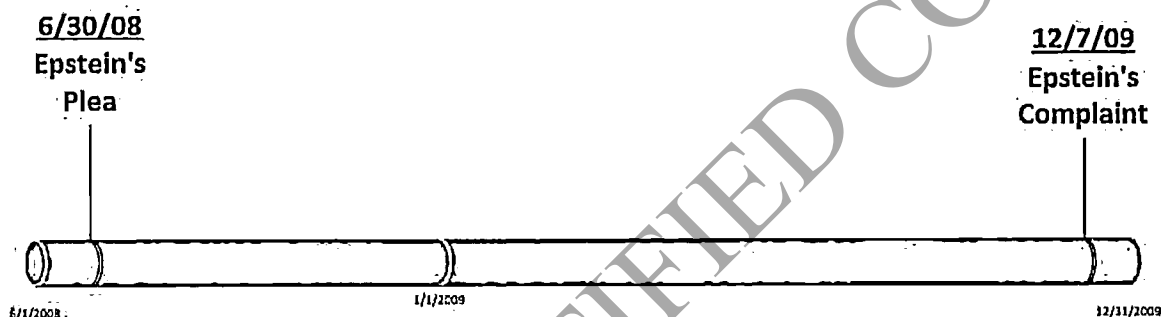
This Court will not find documents relating to Epstein's sex offender status probative of any stipulated issue to be tried in this malicious prosecution action brought by Edwards. The parties identified disputed issues — following this Court's rulings — and the sex offender

registration was not one of them nor does it tend to prove or disprove any identifiable disputed fact. **Exhibit D.**

The simple reason why neither party listed Epstein's sex offender status documents as an issue in the Joint Pretrial Stipulation is that it is both irrelevant and assuredly would result in unfair prejudice or confusion. Undue delay is also a possibility, as the introduction of the sex offender evidence may lead to a trial within a trial – or a sideshow of a criminal action and the explanation of what the various designations mean, how they were arrived at, and the criminal judicial process in each jurisdiction from which registration documents are taken. *See Slocum v. State*, 757 So. 2d 1246, 1251 (Fla. 4th DCA 2000) (“To open the door to evidence about an unrelated case was to create a trial within a trial; there was a risk that the trial would be needlessly lengthened and that the additional evidence would obscure the discovery of the truth.”).

Even assuming Edwards “changes his mind” and deviates from his statements in open court, as he has recently done and has reserved the right to do again, and argues that the sex offender registration relates to Epstein's malice, even “[r]elevant evidence is inadmissible if its probative value is substantially outweighed by the danger of unfair prejudice, confusion of issues, [or] misleading the jury,” § 90.403, Fla. Stat. (2017). Whatever probative value any such sex offender registration evidence could possibly have is substantially outweighed by the danger of unfair prejudice to Epstein, as well as the likelihood that it would confuse the true issues in this lawsuit and mislead the jury as to the subject of the claims being tried. *See State v. Page*, 449 So. 2d 813, 816 (Fla. 1984) (“[S]ection 90.403 of the evidence code enables the trial court to exclude evidence of prior convictions, even though relevant, if the probative value is substantially outweighed by the danger of unfair prejudice.”).

But despite what Edwards might argue, in fact, the plea agreement that required sex offender registration has no relevance to any alleged absence of probable cause or malice. Epstein's plea occurred one and half years before Epstein filed his original civil proceeding against Edwards, Edwards had no role in the plea agreement, and there is nothing in it for which Edwards conceivably could claim Epstein holds him responsible. It simply had nothing to do with Edwards or the issues in this lawsuit:



Moreover, the offense to which Epstein pled guilty, that required him to register, related to a specific individual, A.D., who was never Edwards' client. Edwards' malicious prosecution claim relates to Epstein's complaint against Edwards based on how Edwards litigated only his clients' claims against Epstein while holding himself out as a partner at Rothstein's firm. Those claims involved allegations that Edwards' clients were damaged when Epstein paid them money for sexual services they performed for him and only him. The registrable offense to which Epstein pled guilty was not for payment of money for sexual services performed by Edwards' clients for him, but a procurement offense, the elements of which required receipt of money for serving as a pimp for a person (again, specifically not Edwards' client) providing sexual services to a third party. Even in Edwards' misguided attempt to prove absence of probable cause and malice based on the asserted validity of the claims brought by Edwards' clients, because Edwards' clients were not suing Epstein for pimping for them or for another young woman,

Epstein's registration arising out of a pimping offense had no relation whatsoever to the clients' claims or Edwards' malicious prosecution claim against Epstein.

In short, not only are the exhibits relating to Epstein's sex offender registration unduly prejudicial, they are completely irrelevant to any fact at issue for trial and their prejudicial impact of a sideshow would unquestionably create reversible error. Epstein requests that this Court preclude from admission into evidence all of Edwards' exhibits relating to Epstein's sex offender registration (again, other than the basic fact that as part of his plea agreement, Epstein agreed to and did comply with all registration requirements as a sexual offender) and any reference to same by Edwards, his counsel, and any witnesses he calls.

The Sex Offender Registry Information is Improper Character Evidence

Additionally, the registration information is inadmissible under sections 90.404 and 90.405, Florida Statutes, because its only purpose is to disparage Epstein's character. Florida law is clear that "[e]vidence of a person's character or a trait of character is inadmissible to prove action in conformity with it on a particular occasion" except under certain limited circumstances not present here. § 90.404(1), Fla. Stat. (2017); *see also* § 90.405(2), Fla. Stat. (2017) ("When character or a trait of character of a person is an essential element of a charge, claim, or defense, proof may be made of specific instances of that person's conduct.") (emphasis added). Here, Epstein's sex offender registration is irrelevant to the issues at trial and would serve only to portray him in a negative light.

The Sex Offender Registry Information is Improper Impeachment Evidence

The registration information also is inadmissible under sections 90.609 and 90.610, Florida Statutes, because it is irrelevant to Epstein's truthfulness and goes far beyond the bare

fact he entered a plea agreement.⁴ See § 90.609, Fla. Stat. (2017) (character evidence used to impeach a witness “may refer only to character relating to truthfulness”).

While section 90.610 permits a party to impeach a witness by evidence if the witness was convicted of a felony or a crime involving dishonesty, Epstein’s registration information falls outside this narrow category of impeachment evidence by addressing the nature of his crime (a sexual offense). Impeachment under section 90.610 is strictly limited to the fact the witness was convicted of a felony or crime involving dishonesty, and the number of convictions. Further details, including the nature of the crime, are off limits. See *Rogers v. State*, 964 So. 2d 221, 222-23 (Fla. 4th DCA 2007) (“[I]mpeachment by prior convictions is restricted to determining if the witness has previously been convicted of a crime, and if so, how many times.”) (citation and internal quotation marks omitted); *Botte v. Pomeroy*, 497 So. 2d 1275, 1280 (Fla. 4th DCA 1986) (“[Q]uestioning is limited to whether the witness has ever been convicted of a felony or a crime involving dishonesty. . . . The witness may be required to give the number of convictions, but if he answers truthfully, no further questions may be asked. In particular, the nature of the crimes may not be elicited.”) (emphasis added; internal citations omitted); *Reeser v. Boats Unlimited, Inc.*, 432 So. 2d 1346, 1349 (Fla. 4th DCA 1983) (“Neither statute [including § 90.610] permits the elicitation of the nature of the crime, because any additional light on his credibility would not compensate for the possible prejudicial effect on the minds of the jurors.”) (emphasis added).

The Sex Offender Registry Information is Inadmissible Hearsay

Finally, this Court must exclude the sex offender registry information as it is inadmissible hearsay not covered by any hearsay exception. In *Nationwide Mutual Fire Insurance Company v. Darragh*, 95 So. 3d 897 (Fla. 5th DCA 2012), the Fifth District Court of Appeal held that

⁴ Even the fact that Epstein entered a plea agreement is irrelevant, as there are often reasons other than guilt which prompt an accused person to enter a guilty plea.

website materials were inadmissible hearsay, and cited with approval *St. Luke's Cataract and Laser Inst., P.A. v. Sanderson*, 2006 WL 1320242 (M.D. Fla. May 12, 2006), which held that "Web-sites are not self-authenticating. To authenticate printouts from a website, the party proffering the evidence must produce some statement or affidavit from someone with knowledge of the website . . . for example a web master or someone else with personal knowledge would be sufficient." See also *Almond v. State*, 1 So.3d 1274, 1276 (Fla. 1st DCA 2009) ("The trial court erred in allowing the admission of Appellant's sexual registration forms . . . because none of these documents were self-authenticating business records, a record custodian was not present to testify as to their authenticity, and they did not fall under the public records exception to the hearsay rule.").

CONCLUSION

As clearly established by the Joint Pretrial Stipulation, Edwards has already agreed that whether Epstein is a registered sex offender is not an issue for this trial. Moreover, Epstein does not dispute that, as part of his criminal plea, he pled guilty to one count of an offense that required him to register as a sexual offender and comply with registration related requirements as required by law — with which he has fully complied. The Court has already ruled that Epstein's plea and the fact that it required Epstein's compliance with all registration requirements as a sexual offender may be admitted into evidence. Nevertheless, neither Epstein's plea, nor the registrable offense to which he pled guilty have any relation to Edwards' clients or the specific civil claims Edwards' clients asserted against Epstein, and they certainly bear no relation to any issue to be tried in Edwards' malicious prosecution case against Epstein. Edwards cannot identify a single question of fact that the registry documentation tends to prove or disprove. Rather, this consistent attempt by Edwards to re-litigate closed civil tort claims of his clients and

others or a criminal case which was resolved ten years earlier and interject a sideshow or mini-trials in this matter must be rejected. Edwards' purpose is inconsistent with the Florida Evidence Code, specifically sections 90.401, 90.403, 90.404, 90.405, 90.609, and 90.610, Florida Statutes, by attempting to take advantage of the jury's negative reaction to such information.

WHEREFORE, Plaintiff/Counter-Defendant, Jeffrey Epstein, respectfully requests that this Honorable Court enter an Order excluding all testimony (other than the basic fact that as part of Epstein's plea deal he agreed to and did comply with all registration requirements as a sexual offender) and the admission of all evidence of any sex offender registry documents and information at the trial of this case.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on February 8, 2018, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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EXHIBIT A

NOT A CERTIFIED COPY

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN;

Plaintiff,

vs.

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

Defendants,

COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
SECOND AMENDED EXHIBIT LIST

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his Amended Exhibit List as follows:

INDEX TO OBJECTIONS

- | | |
|--|---|
| 0. No objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.

Case No. 502009CA040800XXXXMBAG

Counter-Plaintiff's, Bradley J. Edwards, Second Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Epstein Property Inspection, 01/18/10.			

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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

17.	Application for Search Warrant of Jeffrey Epstein's home.			
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (<i>from Palm Beach State Attorney's File, Exhibit #29</i>).			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			
32.	List of properties and vehicles in Larry Visoski's name.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.:
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List:

33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
34.	All discovery related responses of Jeffrey Epstein in this matter and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.			
36.	All Complaints in which Jeffrey Epstein is/was a defendant.			
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.			
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.			
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.			
41.	Report and Analysis of Jeffrey Epstein's assets.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR), 07/09/2008			
47.	Expert Dr. L. Dennison Reed's Report of Victim..			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez,			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

	Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts.			
67.	Documents related to Jeffrey Epstein's investments.			
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)D			
70.	Letter from Guy Fronstin to Assistant State Attorney, 01/11/06.			
71.	Letter from Guy Fronstin to Assistant State Attorney, 01/13/06.			

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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

72.	Letter from Guy Fronstin to Assistant State Attorney, 02/17/06.			
73.	Letter from Guy Fronstin to Assistant State Attorney, 04/06/06.			
74.	Letter from Guy Fronstin to Assistant State Attorney, 04/10/06.			
75.	Letter from Goldberger, 06/22/06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 04/19/06 and Statute 90.410.			
84.	Guy Fronstin letter dated 04/17/06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			

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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes, re: Maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher, 05/01/06.			
95.	Alexandra Hall Police Report, 11/28/04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter to Virginia Roberts, 09/03/08			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.:
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
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Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			
122.	All flight logs for any Jeffrey Epstein owned or controlled aircraft.			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List.

129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011.			
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001.			
134.	Hand Drawing of Bart Simpson (signed by Matt Groening).			
135.	Proposed Joint Letter to the Special Master.			
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).			
137.	Color photo of Virginia Roberts on ferry "New York".			
138.	Scenic photo of Time Square.			
139.	Virginia Roberts photo on back of ship.			
140.	Picture of room in New York.			
141.	Color photo of man on horse (New Mexico Ranch).			
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch).			
143.	Virginia Roberts photo on horse front of ranch.			
144.	Virginia Roberts photo standing against rocks (red coat).			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date).			
146.	Virginia Roberts photo riding horse blue jacket far.			
147.	Virginia Roberts photo on side of horse hand up..			
148.	Virginia Roberts photo on side of horse.			
149.	Virginia Roberts photo outside next to tables.			
150.	Virginia Roberts photo red coat leaning on rail.			
151.	Virginia Roberts photo standing outside next to fireplace.			
152.	Virginia Roberts photo standing in front of ranch.			
153.	Virginia Roberts photo with hand over head (black/white).			
154.	Virginia Roberts photo standing next to piano..			
155.	Virginia Roberts photo in front of fireplace (museum):			
156.	Virginia Roberts photo in front of wagon in museum.			
157.	Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico)..			
158.	Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building.			
159.	Virginia Roberts (Australia Storage): Photo Book 2.			
160.	Cover photo book 2.			
161.	Scenic photo (with back photo white).			
162.	Scenic photo (with back photo white).			
163.	Scenic photo (with back photo white).			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

164.	Scenic photo (with back photo white).			
165.	Virginia Roberts steps with trees overhead.			
166.	Scenic photo (with back photo white).			
167.	Scenic photo (with back photo white).			
168.	Scenic photo (with back photo white).			
169.	Scenic photo (with back photo white).			
170.	Scenic photo (with back photo white and black).			
171.	Scenic photo (with back photo white and black).			
172.	Scenic photo (with back photo white and black).			
173.	Virginia Roberts on steps with children (with back photo white and black).			
174.	Virginia Roberts on street white wall (far) (with back photo white and black).			
175.	Travel envelope.			
176.	Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts.			
177.	Thailand Hotel Receipts.			
178.	Court Docket for Jane Doe No. 102 v. Epstein.			
179.	Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein.			
180.	Ghislaine Maxwell deposition, 04/22/16			
181.	FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11.			
182.	Mark Epstein Deposition.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

183.	March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File).			
184.	Color photos of Ghislaine Maxwell, one with Jeffrey Epstein.			
185.	Airport Codes (<i>Demonstrative</i>).			
186.	March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!			
187.	DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1.			
188.	[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05.			
189.	Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account.			
190.	Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files).			
191.	Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005.			
192.	Folder titled Sara Kellen: AT&T February 12, 2005 Statement.			
193.	Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez.			
194.	Santa Monica Police Report (May 12, 1997).			
195.	Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein.			

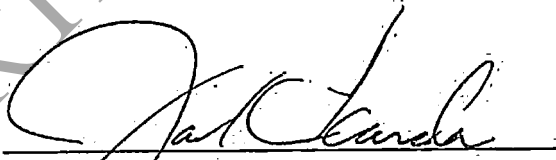
Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

196.	Palm Beach House/Information Sheet.			
197.	Sworn Statement of Juan Alessi taken by Palm Beach Police Department.			
198.	Juan Alessi Deposition (Vol. I) 09/08/09.			
199.	Juan Alessi Deposition (Vol II) 09/08/09.			
200.	Brochure for Boeing Super 727-100.			
201.	Passport application; issued January 12, 2001.			
202.	Sentencing Transcript, Alfredo Rodriguez.			
203.	Criminal Complaint – Alfredo Rodriguez.			
204.	Plea Agreement – Alfredo Rodriguez.			
205.	Photos of Jeffrey Epstein's properties and planes.			
206.	Photos of Jeffrey Epstein employees and former employees.			
207.	Jeffrey Epstein Guilty Plea documents.			
208.	Palm Beach County State Attorney's Response to Public Records Request (<i>including audio recordings</i>).			
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
211.	Any and all documents produced in this action.			
212.	Any and all depositions taken in this action.			
213.	Any documents or other exhibit attached to or used during any deposition in this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List.

214.	Any and all exhibits, documents, etc. referred to in any deposition.			
215.	Any and all documents and exhibits designated by all parties to this action.			
216.	Any and all exhibits needed for impeachment or rebuttal.			
217.	Any and all pleadings filed in this action.			
218.	Any and all records produced or that will be produced by all records custodians relative to this action.			

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 7th day of December, 2017.


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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

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Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

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EXHIBIT B

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA
CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant.

**REQUEST FOR JUDICIAL NOTICE PURSUANT TO
FLORIDA STATUTES SECTION 90.202 AND 90.203**

Counter-Plaintiff, Bradley J. Edwards, by and through his undersigned counsel, hereby requests, pursuant to the Section 90.202(5) and (6) and Section 90.203, Fla. Stat., that this Court take judicial notice of Counter-Defendant, Jeffrey Epstein's, New York State Sex Offender registration information, which is maintained by the New York State Division of Criminal Justice Services at the following url:

http://www.criminaljustice.ny.gov/SomsSUBDirectory/ReCaptchaServlet?offenderId=33216&recaptcha_challenge_field=03AHhf_51eLO9zfIBJrOj6nFIZ9bFX-NJqrpg6v5OhzYiJrjVXGxVDm9EzTzOPlx6WkZdgBnybEGt8ufJFuaPpGbiM44zA6ij62cllvYFrm6nY_F_mdnRmf6sPU5F5TME_NIWhSZNDFEN8VnuwPvM_OjKv2yc1BMFkYv7JQSBxdZTwlS5jOUuKkW1aHNRElFbtBV_vdxRMj8qs_50A152fcOh1Efg_XKBT7A&recaptcha_response_field=SIBLEY+BERTARIN_A&Submit=Search

EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

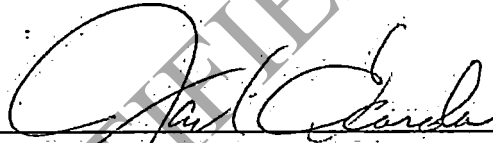
Request for Judicial Notice Pursuant to Florida Statutes Section 90.202

Page 2 of 3

A true and correct copy of the referenced Statutes and of the Epstein's New York State Sex Offender registration information is attached hereto as Exhibit 'A'.

WHEREFORE, Counter-Plaintiff, Bradley Edwards, respectfully requests that the Court take judicial notice of the above-described items pursuant to this Request, as well as grant any such further relief as the Court deems just and proper given the circumstances.

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 8th day of November, 2017.



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West's Florida Statutes Annotated
Title VII. Evidence (Chapters 90-92)
Chapter 90. Evidence Code (Refs & Annos)

West's F.S.A. § 90.202

90.202. Matters which may be judicially noticed

Currentness

A court may take judicial notice of the following matters, to the extent that they are not embraced within s. 90.201:

- (1) Special, local, and private acts and resolutions of the Congress of the United States and of the Florida Legislature.
- (2) Decisional, constitutional, and public statutory law of every other state, territory, and jurisdiction of the United States.
- (3) Contents of the Federal Register.
- (4) Laws of foreign nations and of an organization of nations.
- (5) Official actions of the legislative, executive, and judicial departments of the United States and of any state, territory, or jurisdiction of the United States.
- (6) Records of any court of this state or of any court of record of the United States or of any state, territory, or jurisdiction of the United States.
- (7) Rules of court of any court of this state or of any court of record of the United States or of any other state, territory, or jurisdiction of the United States.
- (8) Provisions of all municipal and county charters and charter amendments of this state, provided they are available in printed copies or as certified copies.
- (9) Rules promulgated by governmental agencies of this state which are published in the Florida Administrative Code or in bound written copies.
- (10) Duly enacted ordinances and resolutions of municipalities and counties located in Florida, provided such ordinances and resolutions are available in printed copies or as certified copies.
- (11) Facts that are not subject to dispute because they are generally known within the territorial jurisdiction of the court.

(12) Facts that are not subject to dispute because they are capable of accurate and ready determination by resort to sources whose accuracy cannot be questioned.

(13) Official seals of governmental agencies and departments of the United States and of any state, territory, or jurisdiction of the United States.

Credits

Laws 1976, c. 76-237, § 1; Laws 1977, c. 77-174, § 1; Laws 1978, c. 78-361, § 3.

West's F. S. A. § 90.202, FL ST § 90.202

Current through the 2017 First Regular Session and Special "A" Session of the 25th Legislature

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West's Florida Statutes Annotated
Title VII. Evidence (Chapters 90-92)
Chapter 90. Evidence Code (Refs & Annos)

West's F.S.A. § 90.203

90.203. Compulsory judicial notice upon request

Currentness

A court shall take judicial notice of any matter in s. 90.202 when a party requests it and:

(1) Gives each adverse party timely written notice of the request, proof of which is filed with the court, to enable the adverse party to prepare to meet the request.

(2) Furnishes the court with sufficient information to enable it to take judicial notice of the matter.

Credits

Laws 1976, c. 76-237, § 1.

West's F. S. A. § 90.203, FL ST § 90.203

Current through the 2017 First Regular Session and Special "A" Session of the 25th Legislature

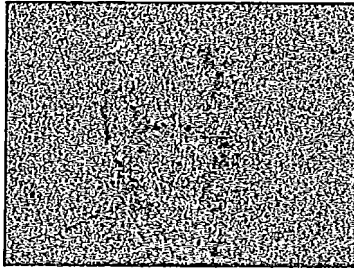
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Offender Details

Anyone who uses this information to injure, harass or commit a criminal act against any person may be subject to criminal prosecution.

Domiciled



Close Photos

Additional Offender Photos

Offender ID : 33216

Name : EPSTEIN, JEFFREY



03/28/2017



03/18/2016



03/27/2014



03/29/2013



03/12/2012



03/28/2011

Offender Id	33216	Race	White
Last Name	EPSTEIN	Ethnicity	Unknown
First Name	JEFFREY	Height	6' 00"
Middle Name	E	Weight	180
DOB	Jan, 20, 1953	Hair	Gray
Sex	Male	Eyes	Blue
Risk Level	3	Corr. Lens	
Designation	No Designation Applies	Photo Date	April 13, 2017

Current Addresses

Type	RES (Primary)
County	
Address	LITTLE ST JAMES 6100 RED HOOK QUARTER B3 ST THOMAS, Virgin Islands 00802

Type RES (Secondary)
County
Address 358 EL BRILLO WAY
PALM BEACH, Florida 33480

Type RES (Secondary)
County
Address GREAT ST JAMES
Virgin Islands

Type RES (Secondary)
Country France
Address JEFFREY EPSTEIN
22 AVENUE FOCH APT 2DD
PARIS 75116
FRANCE

Type RES (Secondary)
County New York
Address 9 E 71ST ST
NEW YORK, New York 10021-4102

Type RES (Secondary)
County
Address 49 ZORRO RANCH RD
STANLEY, New Mexico 87056

Type EMP (Primary)
County
Address 6100 RED HOOK QUARTER
B3
ST THOMAS, Virgin Islands 00802

Law Enforcement Agency Having Jurisdiction

Virgin Islands Dept of Justice - Sex Offender Registry

Current Conviction

Title	Section
OUT	000000000
Subsection	Class
000000	U
Category	Counts
F	1

Description
Non-NYS Felony Sex Offense

Date of Crime
July 23, 2006

Date Convicted
June 30, 2008

Victim Sex/Age

Female, 14 Years

Female, 16 Years

Female, Unknown

Arresting Agency

Florida Dept of Law Enforcement - Sex Offender Registry

Offense Descriptions

Sexual Intercourse

Deviate Sexual Intercourse

Sexual Contact

Relationship to Victim

None Reported

Weapon Used

None Reported

Force Used

Detail unknown

Computer Used

None Reported

Pornography Involved

None Reported

Sentence

Probation: 6 Month(s) Term: Time Served Unspecified

Previous Conviction(s) Requiring Registration

None Reported

Supervising Agency Information

None Reported

Special Conditions of Supervision

None Reported

Maximum Expiration Date/Post Release Supervision Date of Sentence:

None Reported

Scars, Marks & Tattoos

None Reported

Additional Names/Aliases

EPSTEIN , JEFFREY , EDWARD

Current Vehicles

Lic. Plate No. VI5890TC

State Virgin Islands

Year 2011

Make/Model

Color

Lic. Plate No. IAAA32

State Florida

Year 2017

Make/Model Chevrolet Express

Color Black

EXHIBIT C

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1 sex-offender registrations.

2 MR.. SCAROLA: May we stop there?

3 THE COURT: Yes..

4 MS.. ROCKENBACH: Before we stop, Your
5 Honor, was about to rule on 60 through 62.

6 THE COURT: Sixty through 62 is
7 sustained for the reasons that I've already
8 earlier indicated on the record.

9 Sixty-three. Epstein's sex offender
10 registrations..

11 MR. SCAROLA: Yes, as part of
12 Mr. Epstein's sex offender registration,
13 particularly in the state of New York -- I'm
14 not sure the extent to which it applies
15 elsewhere -- he was obliged to disclose his
16 ownership interest in vehicles, airplanes
17 and residences, that is, he had to list all
18 of those things. And one of the ways that
19 we have identified Jeffrey Epstein's assets
20 is through those sex offender registration
21 disclosures that he was obliged make and did
22 make.

23 So it has to do with punitive damages
24 in addition, perhaps, to something else.
25 But it has to do with punitive damages in

1 particular.

2 THE COURT: I will take a look at that
3 when the time comes, if it comes at all.

4 Thank you.

5 Booking photographs. Again, same
6 ruling as I made on the other matters
7 regarding the criminal aspects of the case.

8 MR. SCAROLA: This would simply be a
9 photograph, Your Honor.

10 THE COURT: What's its relevancy?

11 MR. SCAROLA: I'm not sure Mr. Epstein
12 is going to be here.

13 THE COURT: Are you planning to
14 subpoena him?

15 MR. SCAROLA: No, sir. No. If he
16 chooses not to be here, I have videotaped
17 deposition.

18 THE COURT: That's fine.

19 MR. SCAROLA: I want to be able to
20 identify him as the person who got
21 convicted.

22 THE COURT: It could be duplicative of
23 a video.

24 MR. SCAROLA: It may be. Again, I just
25 want to explain to Your Honor that's why

EXHIBIT D

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

Case No. 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

JOINT PRETRIAL STIPULATION

Pursuant to this Court's Order Specially Setting Jury Trial Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") and Defendant/Counter-Plaintiff Bradley Edwards ("Edwards") hereby submit this Joint Pretrial Stipulation:

A. List of All Pending Motions: The trial of this matter is special set to commence on March 13, 2018. The parties anticipate that additional Motions will be filed before that date. Presently, the following Motions/Requests are pending:

1. 9/21/17, Edwards' four Motions to Compel and the following related filing:
 - a. 11/27/17, Epstein's Omnibus Response in Opposition to Edwards' Four Motions to Compel.
2. 10/5/17, Epstein's Motion for Sanctions Pursuant to Violation of Confidential Settlement Agreement Against Edwards and His Counsel and the following related filing:
 - a. 11/8/17, Edwards' Response in Opposition.
3. 10/26/17, Edwards' Motion for Protective Order.
4. 11/6/17, Epstein's Supplemental Motion to Compel Discovery, and the following related filings:
 - a. 11/15/17, Edwards' Response in Opposition to Epstein's Supplemental Motion to Compel Discovery.

- b. 9/25/17, Epstein's Motion to Compel Discovery Responses from Edwards; and
 - c. 9/28/17, Edwards' Memorandum in Opposition to Epstein's Motion to Compel Discovery Responses.
- 5. 11/8/17, Edwards' Request for Judicial Notice Pursuant to Florida Statutes Section 90.202 and 90.203, and the following related filings:
 - a. 11/17/17, Epstein's Objection to Edwards' Request for Judicial Notice; and
 - b. 11/28/17, Epstein's Notice of Filing Supplemental Authority.
- 6. 11/13/17, Edwards' Motion in Limine Addressing Scope of Admissible Evidence and the following related filings:
 - a. 11/17/17, Edwards' Supplement to Motion in Limine Addressing Scope of Admissible Evidence;
 - b. 11/22/17, Epstein's Opposition to Edwards' Motion in Limine Addressing Scope of Admissible Evidence; and
 - c. 12/11/17, Edwards' Second Supplement to Motion in Limine Addressing Scope of Admissible Evidence.
- 7. 11/17/17, Edwards' Objection to Notice of Production from Non-Parties and the following related filing:
 - a. 11/13/17, Epstein's Notice of Production from Non-Parties.
- 8. 11/22/17, Epstein's Request for Judicial Notice.
- 9. 12/1/17, Edwards' Motion for Leave to Propound Limited Requests for Admission.
- 10. 12/4/17, Edwards' Notice of Filing Deposition Transcript Excerpts and Discovery Responses by Epstein Implicating the Fifth Amendment (as to Sections II – V only).
- 11. 12/4/17, Edwards' Notice of Filing Deposition Transcript Excerpts and Discovery Responses by Epstein Implicating the Attorney-Client Privilege.
- 12. 12/4/17, Edwards' Request for Judicial Notice Pursuant to Florida Statutes Section 90.202 and 90.203.
- 13. 12/8/17, Edwards' Notice of Filing Preliminary Objections and Counter Designations to Epstein's Deposition Designations.
- 14. 12/15/17, Epstein's Motion for Leave to Disclose Expert Witness

B. Stipulated Facts:

1. On June 30, 2008, Epstein entered a guilty plea for one count of felony solicitation of prostitution, a third-degree felony, and one count of procuring a person under the age of 18 for prostitution, a second-degree felony. (Plea, D.E. 1107.)
2. Edwards was admitted to The Florida Bar in March 2002. (Edwards' 11/10/17 Depo. 43:10-12.)
3. After being admitted to the Florida Bar, Edwards worked as an Assistant State Attorney at the Broward State Attorney's Office for approximately three years. (Edwards' 5/15/13 Depo. 6:11-15; Edwards' 11/10/17 Depo. 50:3-5.)
4. After leaving the Broward State Attorney's Office, Edwards went to work for the law firm of Kubicki Draper, where he worked for approximately three years handling insurance defense matters. (Edwards' 5/15/13 Depo. 7:3-10; Edwards' 11/10/17 Depo. 56:10-58:5.)
5. Edwards formed a Florida limited liability company on April 16, 2007, by the name of "The Law Office of Brad Edwards & Associates, LLC." (Sunbiz.org.)
6. Edwards began working at Rothstein, Rosenfeldt and Adler, P.A. ("RRA") in April 2009. (Edwards' 3/23/10 Depo. 13:19-22.)
7. Edwards' association with RRA terminated at the end of October or beginning of November 2009. (Edwards' 3/23/10 Depo. 15:5-11.)
8. While an employee of RRA, Edwards represented himself to the public, including Epstein, as a partner of RRA. (Edwards' 11/10/17 Depo. 189:22-192:9.)
9. Scott Rothstein ("Rothstein") was the managing partner and CEO of RRA. (Edwards' 11/10/17 Depo. 267:12-13.)
10. Rothstein voluntarily relinquished his law license in November 2009 and was disbarred by the Florida Supreme Court on November 25, 2009. (11/25/09 Opinion, *The Florida Bar v. Rothstein*, Supreme Court of Florida, Case No. SC09-2146.)

11. Rothstein was arrested and arraigned in federal court in Broward County, Florida on December 1, 2009. (12/1/09 Information, *United States of America v. Rothstein*, United States District Court, Southern District of Florida, Case No. 09-60331 (D.E. 1).)
12. In August and September 2008, while working at The Law Office of Brad Edwards & Associates, LLC, Edwards filed three separate lawsuits against Epstein on behalf of three separate clients: L.M., E.W. and Jane Doe. (8/14/08 Complaint, *Jane Doe v. Jeffrey Epstein*, United States District Court, Southern District of Florida, Case No. 08-CV-80893 (D.E. 1); 9/11/08 Complaint, *L.M. v. Jeffrey Epstein*, 15th Judicial Circuit Court, Palm Beach County, Case No. 50-2008-CA-028051 (D.E. 4); 9/11/08 Complaint, *E.W. v. Jeffrey Epstein*, 15th Judicial Circuit Court, Palm Beach County, Case No. 50-2008-CA-028058 (D.E. 4).)
13. Epstein does not admit or deny the truth of the allegations in the lawsuit brought by Edwards when he was a sole practitioner on behalf of his three clients (L.M., E.W. and Jane Doe). However, Epstein does not challenge Edwards' good faith when he filed the lawsuits against Epstein.
14. While an employee of RRA, Edwards was the lead attorney on the L.M., E.W. and Jane Doe cases against Epstein. (Edwards' 11/20/17 Depo. 78:3-6; 120:11-18.)
15. While an employee of RRA, Edwards was the sole employee of RRA who made strategic decisions on the L.M., E.W. and Jane Doe cases against Epstein. (Edwards' 11/20/17 Depo. 85:2-15.)
16. While an employee of RRA, Edwards did not represent any individuals other than L.M., E.W. and Jane Doe with regard to claims against Epstein. (Edwards' 3/23/10 Depo. 291:8; Edwards' 11/10/17 Depo. 77:1-7.)
17. On July 24, 2009, while Edwards was employed by RRA, a Complaint was filed on behalf of L.M. in the United States District Court for the Southern District of Florida. (7/24/09 Complaint, *L.M. v. Jeffrey Epstein*, United States District Court, Southern District of Florida, Case No. 09-CV-81092 (D.E. 1).)
18. L.M. already had a state court action pending against Epstein at the time the July 24, 2009, federal Complaint was filed which was based on the same facts and circumstances. (Edwards' 11/10/17 Depo. 316:11-20.)

19. Edwards never formally served Epstein with the federal Complaint that was filed on behalf of L.M. against Epstein. (Edwards' 5/15/13 Depo. 34:10-20.)
20. L.M.'s July 24, 2009, federal Complaint against Epstein alleged that Epstein forced her into "oral sex," yet L.M. testified that she never engaged in oral, anal or vaginal intercourse with Epstein and she never touched his genitalia. (Edwards' Answer to Complaint ¶ 42(j) (D.E. 19).)
21. While Edwards was employed by RRA he made the decision to take the deposition of three pilots who had flown, at different times, airplanes used by Epstein, and sought the deposition of a fourth pilot as part of the litigation against Epstein. (Edwards' Answer to Complaint ¶ 36 (D.E. 19).)
22. On August 24, 2009, L.M. noticed the depositions of Epstein's pilots Lawrence Paul Visoski, Jr., and David Hart Rogers. L.M. requested they produce "[a]ll original flight logs from January, 1998 through present for any and all aircraft/airplanes/jets which [they] piloted or co-piloted that were owned or controlled by Jeffrey Epstein or Ghislaine Maxwell." (8/24/09 Notices of Deposition and Subpoena Duces Tecums, *L.M. v. Jeffrey Epstein*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2008-CA-028051-XXXX-MB (D.E. 114, 115).)
23. In August 2009, while Edwards was employed by RRA, he noticed the deposition of Donald Trump in the *Jane Doe* litigation. (8/11/09 and 8/24/09, Re-Notices of Taking Videotaped Depositions, *Jane Doe v. Jeffrey Epstein*, United States District Court, Southern District of Florida, Case No. 08-80893.)
24. While Edwards was employed by RRA, he served Answers to Interrogatories on behalf of L.M. and E.W. indicating that he intended to call Bill Richardson, who was the governor of New Mexico at the time, as a trial witness as part of Edwards' clients' litigation against Epstein. (Edwards' Answer to Complaint ¶ 40 (D.E. 19).)
25. Edwards' three clients (L.M., E.W. and Jane Doe) never testified that they had sex with a celebrity, dignitary or international figure associated with Epstein. (Edwards' 11/10/17 Depo. 167:21-168:10.)
26. In August 2009, Edwards, on behalf of his client E.W., served a Request for Entry Upon Land seeking to inspect Epstein's entire home and property and to take videos

and photograph it. (8/10/09, Request for Entry Upon Land, *E.W. v. Jeffrey Epstein*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2008-CA-028058-XXX-MB (D.E. 143).)

27. On August 20, 2009, the Court in the E.W. matter noted that E.W.'s request to inspect Epstein's entire home and property was withdrawn. (8/20/09, Order on Plaintiff's Request for Entry Upon Land, *E.W. v. Jeffrey Epstein*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2008-CA-028058-XXX-MB (D.E. 151).)
28. In August and September 2009, Edwards, on behalf of his client L.M., served Notices of Production from Non-Parties evidencing his intent to obtain Epstein's medical records from Stephen Alexander, Bruce W. Markowitz and Charles J. Galecki. The Subpoenas sought, "[t]he complete medical file including MRIs, scans, X-rays and any other diagnostic test result, Intake Form, notes, reports, opinions, correspondence to or from third parties, correspondence to or from Jeffrey Epstein, referrals, medical bills, in short, your complete file." (8/19/09 and 9/11/09, Notice of Production from Non-Party, *L.M. v. Jeffrey Epstein*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2008-CA-028051-XXXX-MB (D.E. 105, 127, 129).)
29. On August 14, 2009, Edwards, on behalf of his client L.M., served Notices of Production from Non-Parties evidencing his intent to obtain Epstein's prescription history from Lewis Pharmacy and Greens Pharmacy. The Subpoenas sought, "[a] complete computer printout of any and all prescriptions for medication, name and type of prescription, and all other documentation or information on or regarding Jeffrey Epstein." (8/14/09, Notice of Production from Non-Party, *L.M. v. Jeffrey Epstein*, 15th Judicial Circuit, Palm Beach County, Case No. 50-2008-CA-028051-XXXX-MB (D.E. 97, 100).)
30. On April 24, 2007, L.M., before she was a client of Edwards, provided a statement to the FBI.
31. In September 2009, while Edwards was employed by RRA, his client, L.M., testified at a deposition in her case against Epstein.
32. On June 19, 2009, Edwards, on behalf of his Jane Doe client, filed a Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 Million Bond to Secure

Potential Judgment. (6/19/09 Motion, *Jane Doe No. 2 v. Jeffrey Epstein*, United States District Court, Southern District of Florida, Case No. 08-CV-80119 (D.E. 165).)

33. In July 2010, Epstein settled the claims of Edwards' three clients (E.W., L.M. and Jane Doe). (Edwards' 11/10/17 Depo. 305:2-3.)
34. The Ponzi scheme through which Rothstein misrepresented claims and defrauded investors began in 2005 and ended in October 2009. (11/9/09 Verified Complaint for Forfeiture *In Rem* ¶ 13, *United States v. Real Properties Purchased by Scott Rothstein*, United States District Court, Southern District of Florida, Case No. 09-CV-61780 (D.E. 1).)
35. On November 20, 2009, certain investors of Rothstein's Ponzi scheme sued Rothstein in the Seventeenth Judicial Circuit Court, in and for Broward County, Florida. This lawsuit was part of the public record as of the date it was filed. (11/20/09 Complaint, *Razorback Funding, LLC, et al. v. Scott Rothstein, et al.*, 17th Judicial Circuit Court, Broward County, Florida, Case No. 062009CA062943AXXXCE.)
36. The United States government filed an Information against Rothstein on or about December 1, 2009. This criminal charge was public record as of the date it was filed. (12/1/09 Information, *United States of America v. Rothstein*, United States District Court, Southern District of Florida, Case No. 09-60331.)
37. On December 7, 2009, Epstein filed a civil Complaint in this action against Rothstein, Edwards and L.M. (12/7/09 Complaint, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXXMB (D.E. 5).)
38. On December 21, 2009, just 17 days after Epstein instituted the civil proceeding, Edwards filed a Counterclaim for abuse of process against Epstein. (12/21/09 Answer and Counterclaim, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXXMB (D.E. 19).)
39. Edwards represented L.M. in this litigation. (Edwards' 11/10/17 Depo. 255:5-11.)
40. Edwards did not charge L.M. for his representation of her in this litigation. (Edwards' 11/10/17 Depo. 255:12-19; 257:23-258:1.)

41. Edwards did not enter into any written representation agreement with L.M. concerning his representation of her in this litigation. (Edwards' 11/10/17 Depo. 255:20-256:8; 258:2-4.)
42. On January 21, 2010, a Default was entered against Rothstein in this litigation as to all claims in the December 7, 2009, Complaint against Rothstein. (1/21/10 Default, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 27).)
43. In early August 2010, L.M. and Epstein entered into a Stipulation for Order of Dismissal With Prejudice as to L.M. Individually, Only. (8/5/10 Stipulation, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 112).)
44. On August 9, 2010, the Court entered a Final Order of Dismissal With Prejudice as to L.M. Only approving L.M. and Epstein's Stipulation. (8/9/10 Final Order, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 113).)
45. On January 5, 2011, Epstein moved to amend his Complaint, to eliminate certain paragraphs. (1/5/11 Plaintiff's Motion to Amend Complaint, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 195).)
46. On April 12, 2011, Epstein filed an Amended Complaint against Rothstein and Edwards for abuse of process. (4/12/11 Amended Complaint, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 303).)
47. On August 22, 2011, Epstein filed a Second Amended Complaint, which was corrected on August 24, 2011, bringing a claim for abuse of process against Edwards and for conspiracy to commit abuse of process against Rothstein. (8/22/11 Second Amended Complaint and 8/24/11 Notice of Scrivener's Error and Corrected Second Amended Complaint, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 368, 370).)

48. On November 3, 2011, Edwards moved for Final Summary Judgment on Epstein's Second Amended Complaint. (11/3/11 Renewed Motion for Final Summary Judgment, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 401).)
49. Edwards appeared in this action as his own co-counsel on March 27, 2012, before the suit against him was dismissed. (Edwards' 11/10/17 Depo. 257:7-22; 3/27/12 Notice of Appearance, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 468).)
50. On July 26, 2012, the Court set the hearing on Edwards' Renewed Motion for Final Summary Judgment to be held on August 17, 2012. (7/26/12 Order on Edwards' Motion to Reschedule Hearing, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 512).)
51. Epstein dismissed his claims without prejudice against Edwards on August 16, 2012. (8/16/12 Notice of Voluntary Dismissal, *Jeffrey Epstein v. Scott Rothstein, et al.*, 15th Judicial Circuit Court, Palm Beach County, Case No. 502009CA40800XXXMB (D.E. 519).)
52. Edwards' income as a lawyer has been collectively greater from January 2010 to the present than it was from 2002 when Edwards started practicing law through January 2010. (Edwards' 11/10/17 Depo. 47:10-14; 49:4-13.)
53. Edwards is not claiming a loss of income as a result of his reputation being injured by Epstein's filing and continuation of this lawsuit. (Edwards' 10/10/13 Depo. 239:21-22.)
54. Edwards has not seen a doctor or taken any medication as a result of the anxiety caused by this lawsuit. (Edwards' 5/15/13 Depo. 57:23-58:5; Edwards' 11/10/17 Depo. 112:11-20.)

C. Statement of Issues of Fact for Determination at Trial:

1. **Case Against Rothstein.** What, if any, damages were sustained by Epstein and proximately caused by Rothstein? (Edwards does not agree with this language for the reason that the issue as stated fails to tie causation to Rothstein's operation of the Ponzi scheme. It is Edwards' position that failure to limit the issue in this way as to Rothstein has the potential of confusing the jury in determining whether Epstein had any probable cause to claim damages against Edwards arising out of the same circumstances.)

2. **Malicious Prosecution Counterclaim.** The following are issues of fact for determination at trial on Edwards' Counterclaim against Epstein:

A. **Epstein's Position:** Whether, in December 2009, when Epstein instituted his civil proceeding against Edwards, the facts and circumstances known to Epstein were not sufficiently strong to support a reasonable belief that the proceeding against Edwards was supported by existing facts and, thus, Epstein did not have probable cause to institute his civil proceeding. (This issue is based on the Standard Jury Instruction, but Edwards disputes it is appropriate.)

Edwards' Alternate Position: Whether, in December 2009, when Epstein instituted his civil proceeding against Edwards, the facts and circumstances known to Epstein were insufficient to support a belief on the part of a reasonably cautious person that Edwards had engaged in conduct that supported Epstein's claims against Edwards. (Epstein disputes this issue because it does not follow the Standard Jury Instruction. The parties agree that, in the absence of material disputed facts, the issue of whether probable cause existed to support the institution of the civil proceeding brought by Epstein against Edwards is an issue of law to be determined by the Court.)

B. If Epstein had probable cause to initiate the original civil proceeding against Edwards at the time the case was initially filed, whether a reasonably cautious person would have continued to prosecute the civil proceeding

against Edwards, based on new information acquired by Epstein after the case was filed. (The parties agree that in the absence of material disputed facts, the issue of whether Epstein's claim against Edwards was maintained when probable cause no longer existed is an issue to be determined by the Court.)

- C. Epstein's Position: Whether Epstein instituted or continued his civil proceeding against Edwards maliciously and without probable cause for the primary purpose of injuring Edwards or recklessly and without regard for whether the proceeding was justified. (This issue is based on the Standard Jury Instruction, but Edwards disputes it is appropriate.)

Edwards' Alternate Position: Whether Epstein instituted or continued his civil proceeding against Edwards with legal and/or actual malice. (Epstein disputes this issue because it does not follow the Standard Jury Instruction.)

- D. Epstein's Position: Whether the continuation of the civil proceeding by Epstein against Edwards resulted directly and in natural and continuous sequence from Epstein's actions and, but for Epstein's actions, the proceeding would not have been continued. (Edwards disagrees that this is an issue and is of the position that, having conceded that Epstein is responsible for initiating the claim, and having waived any "advice of counsel" defense, it is impossible for Epstein to contend that responsibility for maintenance of the action up until the time of its voluntary dismissal is attributable to anyone but Epstein himself.)

- E. Whether Epstein's civil proceeding against Edwards was terminated in favor of Edwards. (Edwards contends this is a legal issue for determination by the Court.)

- F. Whether the institution or continuation of the civil proceeding by Epstein against Edwards was a substantial contributing cause of damage to Edwards and, but for the malicious institution or continuation of the proceeding, Edwards' damage would not have occurred.

- G. What amount of money, if any, will fairly and adequately compensate Edwards for his compensatory damages that resulted from Epstein's institution or continuation of the civil proceeding against Edwards.

- H. Whether Epstein was guilty of intentional misconduct, reckless disregard or gross negligence which was a substantial cause of Edwards' damages.
- I. Whether punitive damages are warranted as punishment to Epstein for instituting or continuing his civil proceeding against Edwards and/or as a deterrent to others from filing a civil proceeding without probable cause.
- J. Whether the claimed damage is a result of statements made after the institution of the civil proceeding and are thus protected by the litigation privilege, even if any such statements are found to be untrue. (This issue is based on the Standard Jury Instruction, but Edwards disputes it is appropriate because he believes Epstein's Amended Complaints are "statements made after the institution of the civil proceeding" and are afforded no protection by the litigation privilege.)
- K. Bifurcated Proceeding: What amount, if any, should be assessed against Epstein for punitive damages as a punishment for instituting or continuing his civil proceeding against Edwards and/or as a deterrent to others.
- D. Exhibit Lists (with Objections): The parties do not waive their right to amend their Exhibit Lists and to identify additional objections for those exhibits that have not yet been disclosed and/or provided to correspond with the parties' respective Exhibit Lists.
 - 1. Edwards' Exhibit List and Epstein's Objections are attached as Composite Exhibit A.
 - 2. Epstein's Exhibit List and Edwards' Objections are attached as Composite Exhibit B.
- E. Witness Lists: The parties do not waive their right to amend their Witness Lists.
 - 1. Edwards' Witness List is attached as Exhibit C.
 - 2. Epstein's Witness List is attached as Exhibit D.
- F. Estimated Trial Time: Edwards estimates 10 trial days; Epstein estimates 15-20 trial days.

G. Names, Addresses, and Telephone Numbers of Attorneys to Try the Case:

For Jeffrey Epstein:

Scott J. Link
Kara Berard Rockenbach
Link & Rockenbach, PA
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For Bradley J. Edwards:

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David P. Vitale, Jr.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Telephone: (561) 686-6300

H. Number of Peremptory Challenges Per Party: Three;

I. Each Party's proposed jury instructions and verdict form, with citations to supporting authorities:

1. Edwards' proposed jury instructions and verdict form are attached as Composite Exhibit E.
2. Epstein's proposed jury instructions and verdict form are attached as Composite Exhibit F.

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Joint Pretrial Stipulation
Page 14

DATED: December 22, 2017.

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By: /s/ Scott J. Link, with permission

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Trial Counsel for Plaintiff/Counter-

Defendant Jeffrey Epstein

EXHIBIT A

NOT A CERTIFIED COPY

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

Vs.,

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

Defendants,

COUNTER-PLAINTIFF'S, BRADLEY J. EDWARDS,
SECOND AMENDED EXHIBIT LIST

COMES NOW the Counter-Plaintiff, BRADLEY J. EDWARDS, and hereby files his Amended Exhibit List as follows:

INDEX TO OBJECTIONS

- | | |
|--|---|
| 0. No objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No. 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J. Edwards, Second Amended Exhibit List

Counter-Plaintiff No.	Description of Exhibit	Objection	Marked in Evidence	Marked for Identification
1.	All applicable criminal statutes.			
2.	All applicable Florida Statutes.			
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles.			
4.	Order confirmation from <u>Amazon.com</u> for purchase of books SM 101: A Realistic Introduction, "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners".			
5.	Non-Prosecution Agreement.			
6.	Jane Doe 102 Complaint.			
7.	Messages taken from message pads found at Epstein's home.			
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez.			
9.	Jeffrey Epstein's flight logs.			
10.	Jeffrey Epstein's phone records.			
11.	Sarah Kellen's phone records.			
12.	Jail Visitation Logs.			
13.	Jeffrey Epstein's probation file.			
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein.			
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein.			
16.	Video of Epstein Property Inspection, 01/18/10.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

17.	Application for Search Warrant of Jeffrey Epstein's home.			
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints.			
19.	All records of homes, properties, bank accounts and any/ all records related to Jeffrey Epstein's assets.			
20.	Jeffrey Epstein's passport (or copy).			
21.	Jeffrey Epstein's driver's license (or copy).			
22.	List of corporations owned by Jeffrey Epstein.			
23.	Yearbooks of Jane Doe.			
24.	2002 Royal Palm Beach High School Year Book.			
25.	2001 Royal Palm Beach High School Year Book.			
26.	2003 Palm Beach Gardens High School Year Book.			
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (<i>from Palm Beach State Attorney's File, Exhibit #29</i>).			
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation.			
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein.			
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction.			
31.	Jeffrey Epstein's criminal plea colloquy.			
32.	List of properties and vehicles in Larry Visoski's name.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiffs, Bradley J Edwards, Second Amended Exhibit List.

33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
34.	All discovery related responses of Jeffrey Epstein in this matter and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him.			
36.	All Complaints in which Jeffrey Epstein is/was a defendant.			
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.			
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB.			
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG.			
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein.			
41.	Report and Analysis of Jeffrey Epstein's assets.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.			
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes.			
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen.			
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement.			
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR), 07/09/2008			
47.	Expert Dr. L. Dennison Reed's Report of Victim.			
48.	Palm Beach Police Department Incident Report dated 4/20/06.			
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein.			
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein.			
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs.			
52.	Passenger lists for flights taken by Jeffrey Epstein.			
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project.			
54.	Jeffrey Epstein's bank statements.			
55.	Jeffrey Epstein's tax returns.			
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez,			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

	Pappas Suat, Jean Luc Brunel and Amanda Grant.			
57.	DVD of plea and colloquy taken on 6-30-08.			
58.	Transcript of plea and colloquy taken on 6-30-08.			
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)			
60.	No Contact Orders entered against Jeffrey Epstein.			
61.	Criminal Score Sheet regarding Jeffrey Epstein.			
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation.			
63.	Jeffrey Epstein's Sex Offender Registrations (from various states).			
64.	Jeffrey Epstein's Booking photograph.			
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480.			
66.	List of Jeffrey Epstein's House contacts..			
67.	Documents related to Jeffrey Epstein's investments.			
68.	Letter from Chief Michael Reiter to Barry Krischler.			
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)D			
70.	Letter from Guy Fronstin to Assistant State Attorney, 01/11/06.			
71.	Letter from Guy Fronstin to Assistant State Attorney, 01/13/06.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.,
Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

72.	Letter from Guy Fronstin to Assistant State Attorney, 02/17/06.			
73.	Letter from Guy Fronstin to Assistant State Attorney, 04/06/06.			
74.	Letter from Guy Fronstin to Assistant State Attorney, 04/10/06.			
75.	Letter from Goldberger, 06/22/06.			
76.	All subpoenas issued to State Grand Jury.			
77.	Documents related to the rental of a vehicle for Vanessa Zalis.			
78.	Ted's Sheds Documents.			
79.	Documents related to property searches of Jeffrey Epstein's properties.			
80.	Arrest Warrant of Sarah Kellen.			
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04.			
82.	List of Trilateral Commission Members of 2003.			
83.	Alan Dershowitz Letter dated 04/19/06 and Statute 90.410.			
84.	Guy Fronstin letter dated 04/17/06.			
85.	Jeffrey Epstein Account Information.			
86.	Jeffrey Epstein Criminal Closeout Sheet.			
87.	JEGE, Inc. Passenger Manifest.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M..
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88.	Hyperion Air Passenger Manifest.			
89.	Flight information for Dana Burns.			
90.	Passenger List Palm Beach flights 2005.			
91.	Jeffrey Epstein notepad notes, re: Maria.			
92.	Pleadings of Jane Doe 1 and 2 v. US case.			
93.	Jeffrey Epstein 5 th Amendment Speech.			
94.	Reiter letter to Krisher, 05/01/06.			
95.	Alexandra Hall Police Report, 11/28/04.			
96.	Victim's school records and transcripts.			
97.	Victim Notification letter to Virginia Roberts, 09/03/08			
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home.			
99.	Victim's Medical Records from Dr. Randee Speciale.			
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home.			
101.	Emails received from Palm Beach Records related to Jeffrey Epstein.			
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts.			
103.	All copies of convictions related to Jeffrey Epstein.			
104.	Jeffrey Epstein criminal records.			
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.
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106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto.			
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause.			
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits.			
109.	Edwards' reserves all objections to Epstein's Exhibits.			
110.	Edwards reserves the right to supplement and/or amend his Exhibit List.			
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.			
112.	All exhibits listed by Epstein subject to Edwards' objections.			
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.			
114.	Edwards' Motions for Summary Judgment, all attachments thereto and all Undisputed Facts.			
115.	All time records and hourly billing documentation produced in discovery.			
116.	All deposition testimony and discovery responses by Epstein submitted in this action.			

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117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.			
118.	All submissions by Epstein in connection with the Rothstein deposition.			
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.			
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez.			
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew.			
122.	All flight logs for any Jeffrey Epstein owned or controlled aircraft.			
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case.			
124.	Evidence of contributions to the Palm Beach Police Dept.			
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017.			
126.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Complaint, December 7, 2009.			
127.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Fourth Amended Counterclaim, January 9, 2013.			
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013.			

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129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M, Notice of Voluntary Dismissal, August 16, 2012.			
130.	Brad Edward's Times Records and Billing Records related to this matter.			
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile.			
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011.			
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001.			
134.	Hand Drawing of Bart Simpson (signed by Matt Groening).			
135.	Proposed Joint Letter to the Special Master.			
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).			
137.	Color photo of Virginia Roberts on ferry "New York".			
138.	Scenic photo of Time Square.			
139.	Virginia Roberts photo on back of ship.			
140.	Picture of room in New York.			
141.	Color photo of man on horse (New Mexico Ranch).			
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch).			
143.	Virginia Roberts photo on horse front of ranch.			
144.	Virginia Roberts photo standing against rocks (red coat).			

145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date).			
146.	Virginia Roberts photo riding horse blue jacket far.			
147.	Virginia Roberts photo on side of horse hand up.			
148.	Virginia Roberts photo on side of horse.			
149.	Virginia Roberts photo outside next to tables.			
150.	Virginia Roberts photo red coat leaning on rail.			
151.	Virginia Roberts photo standing outside next to fireplace.			
152.	Virginia Roberts photo standing in front of ranch.			
153.	Virginia Roberts photo with hand over head (black/white).			
154.	Virginia Roberts photo standing next to piano.			
155.	Virginia Roberts photo in front of fireplace (museum).			
156.	Virginia Roberts photo in front of wagon in museum.			
157.	Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico).			
158.	Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building.			
159.	Virginia Roberts (Australia Storage): Photo Book 2.			
160.	Cover photo book 2.			
161.	Scenic photo (with back photo white).			
162.	Scenic photo (with back photo white).			
163.	Scenic photo (with back photo white).			

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164.	Scenic photo (with back photo white).			
165.	Virginia Roberts steps with trees overhead.			
166.	Scenic photo (with back photo white).			
167.	Scenic photo (with back photo white).			
168.	Scenic photo (with back photo white).			
169.	Scenic photo (with back photo white).			
170.	Scenic photo (with back photo white and black).			
171.	Scenic photo (with back photo white and black).			
172.	Scenic photo (with back photo white and black).			
173.	Virginia Roberts on steps with children (with back photo white and black).			
174.	Virginia Roberts on street white wall (far) (with back photo white and black).			
175.	Travel envelope.			
176.	Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts.			
177.	Thailand Hotel Receipts.			
178.	Court Docket for Jane Doe No. 102 v. Epstein.			
179.	Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein.			
180.	Ghislaine Maxwell deposition, 04/22/16			
181.	FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11.			
182.	Mark Epstein Deposition.			

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183.	March 19, 2008, email of Assistant U.S. Attorney Ann. Marie Villafana (Summary of the Case) (Coonan File).			
184.	Color photos of Ghislaine Maxwell, one with Jeffrey Epstein.			
185.	Airport Codes (<i>Demonstrative</i>).			
186.	March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!			
187.	DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes; Part 1.			
188.	[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05.			
189.	Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account.			
190.	Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files).			
191.	Folder titled Sara Kellen Cell: Sara Kellen Cell Phone Usage 09/2005-10/2005.			
192.	Folder titled Sara Kellen: AT&T February 12, 2005 Statement.			
193.	Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez.			
194.	Santa Monica Police Report (May 12, 1997).			
195.	Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein.			


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196.	Palm Beach House/Information Sheet.			
197.	Sworn Statement of Juan Alessi taken by Palm Beach Police Department.			
198.	Juan Alessi Deposition (Vol. I) 09/08/09.			
199.	Juan Alessi Deposition (Vol II) 09/08/09.			
200.	Brochure for Boeing Super 727-100.			
201.	Passport application; issued January 12, 2001.			
202.	Sentencing Transcript, Alfredo Rodriguez.			
203.	Criminal Complaint – Alfredo Rodriguez.			
204.	Plea Agreement – Alfredo Rodriguez.			
205.	Photos of Jeffrey Epstein's properties and planes.			
206.	Photos of Jeffrey Epstein employees and former employees.			
207.	Jeffrey Epstein Guilty Plea documents.			
208.	Palm Beach County State Attorney's Response to Public Records Request (<i>including audio recordings</i>).			
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition.			
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.			
211.	Any and all documents produced in this action.			
212.	Any and all depositions taken in this action.			
213.	Any documents or other exhibit attached to or used during any deposition in this action.			

Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M.,
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214.	Any and all exhibits, documents, etc. referred to in any deposition.			
215.	Any and all documents and exhibits designated by all parties to this action.			
216.	Any and all exhibits needed for impeachment or rebuttal.			
217.	Any and all pleadings filed in this action.			
218.	Any and all records produced or that will be produced by all records custodians relative to this action.			

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 7th day of December, 2017.


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Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List:

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Case No.: 502009CA040800XXXXMBAG
Counter-Plaintiff's, Bradley J Edwards, Second Amended Exhibit List

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NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

**PLAINTIFF/COUNTER-DEFENDANT'S OBJECTIONS TO DEFENDANT/
COUNTER-PLAINTIFF'S SECOND AMENDED EXHIBIT LIST**

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein") hereby files his Objections to Defendant/Counter-Plaintiff, Bradley J. Edwards' ("Edwards") Second Amended Exhibit List dated December 7, 2017, and states:

PRELIMINARY STATEMENT

On November 9, 2017, Edwards filed his Amended Exhibit List identifying 142 exhibits. (D.E. 1043.) On November 15, 2017, Epstein filed his Objections to Edwards' exhibits. (D.E. 1058.) In addition, on November 17, 2017, Epstein filed his Revised Omnibus Motion in Limine which, in part, addressed those objections. (D.E. 1070.) The Court heard extensive arguments on Epstein's objections at special set hearings on November 29, 2017, and December 5, 2017, and made rulings on those objections. While, to date, an Order has not been entered memorializing those rulings, Epstein incorporates them herein.

On December 7, 2017, Edwards filed a Second Amended Exhibit List identifying 218 exhibits, which modified some of his earlier disclosed exhibits and identified 79 new items.¹ (D.E. 1109.) At no time during the special set hearings did Edwards' counsel advise the Court that he intended to amend the Exhibit List or that the parties and Court were working from an incorrect list.

Epstein will be filing a renewed Motion in Limine to address Edwards' newly disclosed exhibits. For ease of reference, Epstein has highlighted the changes and new items identified.

OBJECTIONS

LEGEND FOR OBJECTIONS:

- 1 – All Objections.
- 2 – All Objections except Authenticity
- 3 – Relevance
- 4 – Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence
- 5 – Privileged
- 6 – Opinion
- 7 – Hearsay
- 8 – Authenticity
- 9 – Other (please identify basis of objection)
- 10 – Completeness
- 11 – Overbroad
- 12 – Not provided to Counsel for Epstein Prior to Filing Pretrial Stipulation
- 13 – Not a proper exhibit
- 14 – Trade secrets/Confidential

No.	Edwards' Exhibit Description	Epstein's Objections
1.	All applicable criminal statutes	3, 4, 7, 11, 12
2.	All applicable Florida Statutes	3, 4, 7, 11, 12
3.	Photos and information of Jeffrey Epstein's homes, airplanes and automobiles	3, 4, 7, 8, 10, 12

¹ While Edwards produced many of the new exhibits on November 9, 2017, he never identified them as trial exhibits on his Exhibit List and Epstein was not aware that he intended to rely on them at trial at the time of filing his Omnibus Motion in Limine.

No.	Edwards' Exhibit Description	Epstein's Objections
4.	Order confirmation from <u>Amazon.com</u> for purchase of books "SM 101: A realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"	3, 4, 7, 8
5.	Non-Prosecution Agreement	3, 4, 7, 8, 10
6.	Jane Doe 102 Complaint	3, 4, 7, 13
7.	Messages taken from message pads found at Epstein's home	3, 4, 7, 8, 11, 14
8.	Documents related to Jeffrey Epstein produced by Alfredo Rodriguez	3, 4, 7, 8, 11, 14
9.	Jeffrey Epstein flight logs	3, 4, 7, 8, 10, 11
10.	Jeffrey Epstein phone records	3, 4, 10, 11, 14
11.	Sarah Kellen's phone records	3, 4, 8, 10, 11, 14
12.	Jail Visitation Logs	3, 4, 7, 8, 11
13.	Jeffrey Epstein's probation file	3, 4, 7, 8, 11
14.	All probable cause affidavits related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8, 10
15.	Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein	3, 4, 7, 8
16.	Video of Epstein Property Inspection; 01/18/10	3, 4, 8
17.	Application for Search Warrant of Jeffrey Epstein's home	3, 4, 7, 8; Cannot be read
18.	Complaint Jane Doe v. Epstein and all subsequent Amended Complaints	3, 4, 7, 13, 12 (as to "subsequent Amended Complaints")
19.	All records of homes, properties, bank accounts and any/all records related to Jeffrey Epstein's assets	12
20.	Jeffrey Epstein's passport (or copy)	12
21.	Jeffrey Epstein's driver's license (or copy)	Cannot be read, 3, 14
22.	List of corporations owned by Jeffrey Epstein	3, 4, 7, 8, 12
23.	Yearbooks of Jane Doe	3, 4, 7, 8, 12
24.	2002 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
25.	2001 Royal Palm Beach High School Year Book	3, 4, 7, 8, 12
26.	2003 Palm Beach Gardens High School Year Book	3, 4, 7, 8, 12

No.	Edwards' Exhibit Description	Epstein's Objections
27.	Affidavit and Application for Search Warrant on Jeffrey Epstein's home (from Palm Beach State Attorney's File, Exhibit #29)	3, 4, 7, 8, 10,
28.	Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation	3, 4, 7, 8, 10, 11, 14
29.	The Palm Beach State Attorney's Criminal file against Jeffrey Epstein	3, 4, 6, 7, 8, 10, 11, 13
30.	All documents related to Jeffrey Epstein's 6/30/08 conviction	3, 4, 7, 8, 12
31.	Jeffrey Epstein's criminal plea colloquy	3, 4, 7, 8, 12
32.	List of properties and vehicles in Larry Visoski's name	3, 4, 7, 8, 11, 13; The exhibit provided was an entire Motion (which was denied) not just the identified item.
33.	All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in this matter, and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092.	3, 4, 11, 12, 13
34.	All discovery related responses of Jeffrey Epstein in this matter and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
35.	Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him	3, 4, 11, 12, 13
36.	All Complaints in which Jeffrey Epstein is/was defendant	3, 4, 11, 12, 13; This also includes a motion which is not part of the stated exhibit.
37.	Jeffrey Epstein's Deposition testimony and discovery responses in this case and cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092	3, 4, 11, 12, 13
38.	Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXIMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB	3, 4, 11, 12, 13
39.	Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No 502009CA040800XXXXMBAG	3, 4, 11, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
40.	Any and all newspaper articles, online articles or publications related to Jeffrey Epstein	3, 4, 7, 8, 11, 12
41.	Report and Analysis of Jeffrey Epstein's assets	3, 4, 7, 8, 14
42.	Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.	3, 4, 7, 8, 12
43.	Photos of all of Jeffrey Epstein's properties, cars, boats and planes	3, 4, 7, 8, 14, 12 (as to cars and boats)
44.	Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen	3, 4, 7, 8, 10
45.	Documents related to or evidencing Jeffrey Epstein's donations to law enforcement	3, 4, 7, 8, 10
46.	Victim Notification Letter from US Attorney's Office to Victims (CW & SR) 07/09/2008	3, 4, 7, 8, 14
47.	Expert Dr. L. Dennison Reed's Report of Victim	3, 4, 6, 7, 8, 14
48.	Palm Beach Police Department Incident Report dated 4/20/06	3, 4, 7, 8
49.	All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein	3, 4, 7, 8, 12
50.	All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein	3, 4, 7, 8, 12
51.	Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs	3, 4, 7, 8, 10, 11, 12
52.	Passenger lists for flights taken by Jeffrey Epstein	3, 4, 7, 8, 10, 11, 12
53.	Letter from Jeffrey Epstein to Alberto Pinto regarding house island project	3, 4, 7, 8, 10
54.	Jeffrey Epstein's bank statements	3, 4, 7, 8, 12, 14
55.	Jeffrey Epstein's tax returns	3, 4, 7, 8, 12, 14
56.	MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant	3, 4, 7, 8, 12
57.	DVD of plea and colloquy taken on 6-30-08	3, 4, 8, 12, 13
58.	Transcript of plea and colloquy taken on 6-30-08	3, 4, 13
59.	Palm Beach Police Department Incident Report dated 07/25/06 (unredacted)	3, 4, 7, 8
60.	No Contact Orders entered against Jeffrey Epstein	3, 4, 13
61.	Criminal Score Sheet regarding Jeffrey Epstein	3, 4, 7, 8, 12
62.	Documents evidencing Jeffrey Epstein's Community Control and Probation	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
63.	Jeffrey Epstein's Sex Offender Registrations (from various states)	3, 4, 7, 8
64.	Jeffrey Epstein's Booking photograph	3, 4, 7, 8, Document says cannot rely on this for legal action
65.	CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480	3, 4, 7, 8
66.	List of Jeffrey Epstein's House contacts	3, 4, 7, 8, 12 (document provided is not reflective of description)
67.	Documents related to Jeffrey Epstein's investments	3, 4, 7, 8, 12, 14
68.	Letter from Chief Michael Reiter to Barry Krischler	3, 4, 7, 8
69.	Palm Beach Police Department Incident Report dated 07/19/06 (redacted)	3, 4, 7, 8
70.	Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06	3, 4, 7, 8, 10
71.	Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06	3, 4, 7, 8, 10
72.	Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06	3, 4, 7, 8, 10
73.	Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06	3, 4, 7, 8, 10
74.	Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06	3, 4, 7, 8, 10
75.	Letter from Goldberger dated 6-22-06	3, 4, 7, 8
76.	All subpoenas issued to State Grand Jury	3, 4, 7, 8, 13
77.	Documents related to the rental of a vehicle for Vanessa Zalis	3, 4, 7, 8, document produced contains other items not identified on list
78.	Ted's Sheds Documents	3, 4, 7, 8, document produced contains other items not identified on list
79.	Documents related to property searches of Jeffrey Epstein's properties	3, 4, 7, 8, 14
80.	Arrest Warrant of Sarah Kellen	3, 4, 7, 8
81.	Police report regarding Alexandra Hall picking up money dated 11-28-04	3, 4, 7, 8, 10
82.	List of Trilateral Commission Members of 2003	3, 4, 7, 8, 10

No.	Edwards' Exhibit Description	Epstein's Objections
83.	Alan Dershowitz Letter dated 4-19-06 and Statute 90.410	3, 4, 7, 8, 12
84.	Guy Fronstin letter dated 4-17-06	3, 4, 7, 8
85.	Jeffrey Epstein Account Information	3, 4, 7, 8, 12, 14
86.	Jeffrey Epstein Criminal Closeout Sheet	3, 4, 7, 8, 12
87.	JEGE, Inc. Passenger Manifest	3, 4, 7, 8, 10, 11
88.	Hyperion Air Passenger Manifest	3, 4, 7, 8, 10, 11
89.	Flight information for Dana Burns	3, 4, 7, 8, 10, 11
90.	Passenger List Palm Beach flights 2005	3, 4, 7, 8, 10, 11
91.	Jeffrey Epstein notepad notes re Maria	3, 4, 7, 8, 10, 12
92.	Pleadings of Jane Doe 1 and 2 v. US case	3, 4, 12 (document provided is not what is identified on list), 13
93.	Jeffrey Epstein 5 th Amendment Speech	3, 4, 12
94.	Reiter letter to Krisher dated 5-1-06	3, 4, 7, 8, 12
95.	Alexandra Hall Police Report dated 11-28-04	3, 4, 7, 8, 10
96.	Victim's school records and transcripts	3, 4, 7, 8
97.	Victim Notification letter to Virginia Roberts, 09/03/08	3, 4, 7, 8
98.	Police report of Juan Alessi theft at Jeffrey Epstein's home	3, 4, 7, 8, 12
99.	Victim's Medical Records from Dr. Randee Speciale	3, 4, 6, 7, 8
100.	All surveillance conducted by law enforcement on Jeffrey Epstein's home	3, 4, 7, 8, 12
101.	Emails received from Palm Beach Records related to Jeffrey Epstein	3, 4, 7, 8, 12
102.	All items listed on the Palm Beach Police Property Report Lists and/or Property Receipts	3, 4, 7, 8, 12 (items not provided)
103.	All copies of convictions related to Jeffrey Epstein	3, 4, 7, 8, 12
104.	Jeffrey Epstein criminal records	3, 4, 7, 8, 12
105.	All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey	3, 4, 7, 8, 10, 11,
106.	Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and exhibits thereto	3, 4, 7, 8, 12, 13
107.	Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause	3, 4, 7, 8, 12, 13

No.	Edwards' Exhibit Description	Epstein's Objections
108.	Demonstrative aids and exhibits including, but not limited to, charts, diagrams and models, surveys, photographs and similar material including blow-ups of the listed items/exhibits	12
109.	Edwards reserves all objections to Epstein's Exhibits	Not an exhibit.
110.	Edwards reserves the right to supplement and/or amend his Exhibit List	Not an exhibit
111.	By listing an Exhibit, Edwards is not waiving his right to object to same at trial and does not waive their right to amend same.	Not an exhibit
112.	All exhibits listed by Epstein subject to Edwards' objections.	Not an exhibit.
113.	All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations:	3, 4, 7, 8, 12, 13
114.	Edwards' Motions for Summary Judgment, all attachments thereto, and all Undisputed Facts	3, 4, 7, 8, 12, 13
115.	All time records and hourly billing documentation produced in discovery.	3, 4, 7, 8, 12
116.	All deposition testimony and discovery responses by Epstein submitted in this action.	3, 4, 7, 8, 12, 13
117.	All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.	3, 4, 7, 8, 12, 13
118.	All submissions by Epstein in connection with the Rothstein deposition.	3, 4, 7, 8, 12, 13
119.	All Settlement Agreements between Epstein and victims of his sexual molestations.	3, 4, 7, 8, 12, 14
120.	Phone Journal taken from Epstein's home and produced to the FBI by Alfredo Rodriguez	3, 4, 7, 8, 11, 14 (duplicative of Exhibit No. 8)
121.	Photo depicting Virginia Roberts, Ghislaine Maxwell and Prince Andrew	3, 4, 7, 8
122.	All flight logs for any Epstein owned or controlled aircraft	3, 4, 7, 8, 10, 11, 12
123.	All emails produced by Defendant and/or all emails produced by Plaintiff in this case	3, 4, 7, 8, 10, 12
124.	Evidence of contributions to the Palm Beach Police Dept.	3, 4, 7, 8, 10 duplicative of 45
125.	Dr. Bernard J. Jansen Expert Report, Attachments and Back-up Documents, October 20, 2017	3, 4, 6, 7, 8, 10, 11, 13
126.	Jeffrey Epstein vs. Scott Rothstein; Bradley J. Edwards and L.M., Complaint, December 7, 2009	
127.	Jeffrey Epstein vs. Scott Rothstein; Bradley J. Edwards and L.M., Fourth Amended Counterclaim, January 9, 2013	3, 4, 7, 13

No.	Edwards' Exhibit Description	Epstein's Objections
128.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Plaintiff/Counter-Defendant Jeffrey Epstein's Answer and Affirmative Defenses to Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim, February 21, 2013	3, 4, 7, 13
129.	Jeffrey Epstein vs. Scott Rothstein, Bradley J. Edwards and L.M., Notice of Voluntary Dismissal, August 16, 2012	
130.	Brad Edward's [sic] Times Records and Billing Records related to this matter.	3, 4, 7, 8, 10, 12
131.	Jeffrey Epstein's NY State Online Sex Offender Registry Profile	3, 4, 7, 8
132.	New York Post article: Billionaire Jeffrey Epstein: I'm a sex offender, not a predator, February 25, 2011	3, 4, 7, 8
133.	Medical Records: New York Presbyterian Hospital re: Virginia Guiffre, 2001	3, 4, 6, 7, 8, 10
134.	Hand Drawing of Bart Simpson (signed by Matt Groening):	3, 4, 7, 8
135.	Proposed Joint Letter to the Special Master	3, 4, 6, 7, 8
136.	Front and Back of Hard Copy Color Photo Virginia (Mar-A-Lago).	3, 4, 7, 8
137.	Color photo of Virginia Roberts on ferry "New York"	3, 4, 7, 8
138.	Scenic photo of Time Square	3, 4, 7, 8
139.	Virginia Roberts photo on back of ship	3, 4, 7, 8
140.	Picture of room in New York	3, 4, 7, 8
141.	Color photo of man on horse (New Mexico Ranch)	3, 4, 7, 8
142.	Color photo of Virginia Roberts at Zorro Ranch standing in front of gate sign with "Z" (New Mexico Ranch)	3, 4, 7, 8
143.	Virginia Roberts photo on horse front of ranch	3, 4, 7, 8
144.	Virginia Roberts photo standing against rocks (red coat)	3, 4, 7, 8
145.	Virginia Roberts standing against rocks (red coat) (far) (with back photo white; back date):	3, 4, 7, 8
146.	Virginia Roberts photo riding horse blue jacket far	3, 4, 7, 8
147.	Virginia Roberts photo on side of horse hand up	3, 4, 7, 8
148.	Virginia Roberts photo on side of horse	3, 4, 7, 8
149.	Virginia Roberts photo outside next to tables	3, 4, 7, 8
150.	Virginia Roberts photo red coat leaning on rail	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
151.	Virginia Roberts photo standing outside next to fireplace	3, 4, 7, 8
152.	Virginia Roberts photo standing in front of ranch	3, 4, 7, 8
153.	Virginia Roberts photo with hand over head(black/white)	3, 4, 7, 8
154.	Virginia Roberts photo standing next to piano	3, 4, 7, 8
155.	Virginia Roberts photo in front of fireplace(museum)	3, 4, 7, 8
156.	Virginia Roberts photo in front of wagon in museum	3, 4, 7, 8
157.	Color photo of Virginia Roberts in front of museum exhibition (Santa Fe, New Mexico)	3, 4, 7, 8
158.	Photograph in Spain Jeffrey Epstein and Ghislaine Maxwell in front of building!	3, 4, 7, 8
159.	Virginia Roberts (Australia Storage): Photo Book 2	3, 4, 7, 8
160.	Cover photo book 2	3, 4, 7, 8
161.	Scenic photo (with back photo white)	3, 4, 7, 8
162.	Scenic photo (with back photo white)	3, 4, 7, 8
163.	Scenic photo (with back photo white)	3, 4, 7, 8
164.	Scenic photo (with back photo white)	3, 4, 7, 8
165.	Virginia Roberts steps with trees overhead	3, 4, 7, 8
166.	Scenic photo (with back photo white)	3, 4, 7, 8
167.	Scenic photo (with back photo white)	3, 4, 7, 8
168.	Scenic photo (with back photo white)	3, 4, 7, 8
169.	Scenic photo (with back photo white)	3, 4, 7, 8
170.	Scenic photo (with back photo white and black)	3, 4, 7, 8
171.	Scenic photo (with back photo white and black)	3, 4, 7, 8
172.	Scenic photo (with back photo white and black)	3, 4, 7, 8
173.	Virginia Roberts on steps with children (with back photo white and black)	3, 4, 7, 8
174.	Virginia Roberts on street white wall (far) (with back photo white and black)!	3, 4, 7, 8
175.	Travel envelope	3, 4, 7, 8
176.	Singapore Airlines Travel Cover with handwritten notes by Virginia Roberts	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
177.	Thailand Hotel Receipts	3, 4, 7, 8
178.	Court Docket for Jane Doe No. 102 v. Epstein	3, 4, 7, 8, 13
179.	Typed List of Victims/ Co-Conspirators unique to the investigation of Jeffrey Epstein	3, 4, 7, 8, 10
180.	Ghislaine Maxwell deposition, 04/22/16	3, 4, 7, 8, 14
181.	FBI Form 302 - Interview of Virginia Giuffre in Australia (Redacted) 03/17/11	3, 4, 7, 8, 10
182.	Mark Epstein Deposition	3, 4, 7, 8
183.	March 19, 2008, email of Assistant U.S. Attorney Ann Marie Villafana (Summary of the Case) (Coonan File)	3, 4, 7, 8, 10
184.	Color photos of Ghislaine Maxwell, one with Jeffrey Epstein	3, 4, 7, 8
185.	Airport Codes (Demonstrative)	3, 7, 8, 10
186.	March 3, 2011 - New York Post: Uppity Tranny to Epstein: Pay Up!	3, 4, 7, 8
187.	DVD of Epstein PBPD 358 El Brillo Search Warrant Walk Through 05/11/09; DVD Audio from Cassettes, Part 1	3, 4, 7, 8, 12 (only photo of DVDs provided)
188.	[Alex Hall] Redacted Transcript taken by Detective Joe Recarey and Detective Dawson (with Exhibits) 10/11/05	3, 4, 7, 8, 10
189.	Palm Beach Police Investigation: Palm Beach PD Records; Wachovia Bank Account	3, 4, 7, 8, 10, 11
190.	Folder titled Sara Kellen Cell Phone Summary by Detective Recarey: Enclosing phone records. SAO FOIA Disc 7 (State Files)	3, 4, 7, 8, 10, 11
191.	Folder titled Sara Kellen Cell; Sara Kellen Cell Phone Usage 09/2005-10/2005	3, 4, 7, 8, 10, 11
192.	Folder titled Sara Kellen: AT&T February 12, 2005 Statement	3, 4, 7, 8, 10, 11
193.	Demand Deposit Account Statement History for Household Bank Account Jeffrey Epstein or Ghislaine Maxwell or Alfredo Rodriguez	3, 4, 7, 8, 10, 14
194.	Santa Monica Police Report (May 12, 1997)	3, 4, 7, 8
195.	Folder titled PLANES: Information relating to Epstein's planes/aircrafts collected by the State Attorney's Office unique to the investigation of Jeffrey Epstein	3, 4, 7, 8
196.	Palm Beach House/Information Sheet	3, 4, 7, 8
197.	Sworn Statement of Juan Alessi taken by Palm Beach Police Department	3, 4, 7, 8
198.	Juan Alessi Deposition (Vol. I) 09/08/09	3, 4, 7, 8

No.	Edwards' Exhibit Description	Epstein's Objections
199.	Juan Alessi Deposition (Vol II) 09/08/09	3, 4, 7, 8
200.	Brochure for Boeing Super 727-100	3, 4
201.	Passport application; issued January 12, 2001	3, 4, 7, 8, 10
202.	Sentencing Transcript, Alfredo Rodriguez	3, 4, 6, 7
203.	Criminal Complaint — Alfredo Rodriguez	3, 4, 6, 7
204.	Plea Agreement — Alfredo Rodriguez	3, 4, 7, 8
205.	Photos of Jeffrey Epstein's properties and planes	3, 4, 7, 8, 10
206.	Photos of Jeffrey Epstein employees and former employees	3, 4, 7, 8, 10
207.	Jeffrey Epstein Guilty Plea documents	3, 4
208.	Palm Beach County State Attorney's Response to Public Records Request (including audio recordings)	3, 4, 6, 7, 8, 10, 11, 13
209.	Any and all responses to Subpoenas Duces Tecum with or without deposition	3, 4, 6, 7, 8, 10, 11, 12, 13, 14
210.	All Interrogatories and Answers thereto, Requests to Produce and Responses, Requests for Admissions and Responses thereto.	3, 4, 7, 8, 12, 13
211.	Any and all documents produced in this action.	12
212.	Any and all depositions taken in this action.	12, 13
213.	Any documents or other exhibit attached to or used during any deposition in this action	12, 13
214.	Any and all exhibits, documents, etc. referred to in any deposition	12, 13
215.	Any and all documents and exhibits designated by all parties to this action.	12, 13
216.	Any and all exhibits needed for impeachment or rebuttal	12
217.	Any and all pleadings filed in this action	12, 13
218.	Any and all records produced or that will be produced by all records custodians relative to this action	12, 13

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

LINK & ROCKENBACH, PA
1555 Palm Beach Lakes Boulevard, Suite 301
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(561) 727-3600; (561) 727-3601 [fax]

By: /s/ Scott J. Link

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Jeffrey Epstein

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<p>Bradley J. Edwards Edwards Pottinger LLC 425 N. Andrews Avenue, Suite 2 Fort Lauderdale, FL 33301-3268 brad@epllc.com staff.efile@pathtojustice.com <i>Co-Counsel for Defendant/Counter-Plaintiff</i> Bradley J. Edwards</p>	<p>Marc S. Nurik Law Offices of Marc S. Nurik One E. Broward Boulevard, Suite 700 Ft. Lauderdale, FL 33301 marc@nuriklaw.com <i>Counsel for Defendant Scott Rothstein</i></p>
<p>Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>	

EXHIBIT B

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
AMENDED EXHIBIT LIST

Plaintiff/Counter-Defendant Jeffrey Epstein hereby files this list of the trial exhibits he may
introduce at the trial of this matter:

INDEX TO OBJECTIONS

- | | |
|---|---|
| 0. No Objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed
by danger of unfair prejudice, confusion of
issues, misleading the jury, or needless
presentation of cumulative evidence | 9. Other (please identify basis of objection) |

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
<i>Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards and L.M.</i> 15 th Judicial Circuit Case No. 50-2009-CA-040800XXXXMB					
1	12/7/09	Complaint with Exhibits			
2	12/21/09	Answer and Counterclaim of Defendant Bradley J. Edwards			
3	1/21/10	Default against Scott Rothstein			
4	8/2/10 8/9/10	Stipulation and Order of Dismissal with Prejudice as to L.M., Individually Only			
5	3/27/12	Notice of Appearance of Bradley J. Edwards			
6	8/16/12	Notice of Voluntary Dismissal Without Prejudice of Bradley J. Edwards			
7	1/9/13	Bradley J. Edwards' Fourth Amended Counterclaim			
8	9/25/13	Affidavit of Jeffrey Epstein			
9	6/30/17	Affidavit of Jeffrey Epstein			
10	6/30/17	Jeffrey Epstein's Motion for Summary Judgment, Appendix in Support and all documents cited therein			
11	Misc.	All deposition transcripts, exhibits and videotapes including, but not limited to: a. Bradley J. Edwards (3/23/10; 5/15/13; 10/10/13; 11/10/17) b. Jeffrey Epstein (3/17/10; 1/25/12) c. Scott Rothstein (6/14/12) d. Russell Adler (4/20/11) e. Abrakas Joseph Discala (5/25/11) f. Dean Russell Kretschmar (2/11/11) g. Michael Legamaro (3/11/11) h. Courtney Wild (10/12/17)			
12	Misc.	Defendant/Counter-Plaintiff Bradley J. Edwards' Answers, Responses, Objections and Privilege Logs in response to Plaintiff/Counter-Defendant Jeffrey Epstein's Interrogatories, Requests for Admission, Requests for Production, and Subpoenas Duces Tecum			
13	Misc.	All documents produced by any party or non-party in this matter			
14	Misc.	All documents filed in the court file, including pleadings, motions, responses, affidavits, discovery, and exhibits			
15	Misc.	All hearing transcripts			
<i>State of Florida v. Jeffrey Epstein</i> 15 th Judicial Circuit					

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
16	4/24/07	Transcript of Taped Statement of Tatum Miller			
17	Misc.	All other testimony, transcripts and statements provided in the matter			
<i>L.M. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028051XXXXMB					
18	Misc.	Court docket and all court filings referenced therein			
19	9/11/08	Complaint			
20	12/23/08	Amended Complaint			
21	3/30/09	Notice of Change of Firm and Address			
22	4/7/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint			
23	8/19/09 9/11/09	Notices of Production from Non Parties: (1) Stephen Alexander, M.D.; (2) Bruce W. Markowitz, M.D.; and (3) Charles J. Galecki, M.D.			
24	8/24/09	Notices of Taking Deposition and Subpoenas to (1) Lawrence Paul Visoski, Jr. and (2) David Hart Rogers			
25	8/11/09	Plaintiff's Request for Production to Defendant			
26	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint			
27	5/28/10	Plaintiff's Third Amended Complaint			
28	7/22/10	Stipulation of Dismissal With Prejudice			
29	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. L.M. (9/24/09; 2/9/10)			
<i>L.M. v. Jeffrey Epstein</i> USDC S.D. Fla. Case No. 09-CV-81092					
30	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
31	7/24/09	Complaint and Demand for Jury Trial			
32	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 21)			
33	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
34		Federal Rule of Civil Procedure, Rule 11			
<i>E.W. v. Jeffrey Epstein</i> 15th Judicial Circuit Case No. 50-2008-CA-028058XXXXMB					
35	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
36	9/10/08	Complaint			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
37	12/23/08	Amended Complaint			
38	3/30/09	Notice of Change of Firm and Address			
39	4/6/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint			
40	6/2/09	Defendant Epstein's Motion for Order to Terminate or Limit Deposition and Response in Opposition to Plaintiff's Amended Motion to Compel for Sanctions			
41	7/16/09	Cross Notice of Taking Videotaped Deposition of Alfredo Rodriguez			
42	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint			
43	8/10/09	Plaintiff's Request for Entry Upon Land			
44	5/28/10	Plaintiff's Third Amended Complaint			
45	7/22/10	Stipulation of Dismissal With Prejudice			
46	7/29/10	Order Adopting Stipulation and Dismissing Case With Prejudice			
47	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. E.W. (5/6/10)			
<i>Jane Doe v. Jeffrey Epstein</i> USDC S.D. Fla. Case No. 08-CV-80893					
48	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
49	8/12/08	Complaint (D.E. 1)			
50	3/26/09	Defendant Epstein's Motion to Stay and/or Continue Action for Time Certain Based on Parallel Civil and Criminal Proceedings with Incorporated Memorandum of Law (D.E. 24)			
51	4/9/09	Notice of Change of Address and Firm Affiliation (D.E. 30)			
52	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorney's from Revealing Provisions in the Agreement (D.E. 32)			
53	4/17/09	Plaintiff's First Amended Complaint (D.E. 38)			
54	5/14/09	Order Consolidating Cases for Purposes of Discovery and Procedural Motions that Relate to Multiple Cases (D.E. 56)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
55	7/28/09 to 10/22/09	Notices of Taking Deposition and Subpoenas to: Ghislane Noelle Maxwell, Leslie Wexler, Donald Trump, Mark Epstein, Nadia Marcinkova, Jean Luc Bruhel, Sarah Kellen, Michael Freidman, Rosalie Freidman, and Michael Sanka			
56	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 210)			
57	7/20/10	Final Order of Dismissal With Prejudice (D.E. 211)			
58	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<i>Jane Doe 2 v. Jeffrey Epstein (Consolidated Action)</i> USDC S.D. Fla. Case No. 08-CV-80119					
59	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
60	6/19/09	Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165)			
61	7/23/09	Plaintiff Jane Doe's Reply Memorandum in Support of Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 217)			
62	10/16/09	Plaintiff Jane Doe's Notice that Additional Evidence of Epstein's Fraudulent Asset Transfers Will be Filed Shortly, etc. (D.E. 357)			
63	10/30/09	Plaintiff Jane Doe's Motion for Leave to Provide Recently-Obtained Deposition Testimony and Affidavit Demonstrating Fraudulent Transfers by Epstein in Support of Motion for Appointment of a Receiver to Take Charge of Property of Epstein and Incorporated Supporting Memo of Law (D.E. 386)			
64	11/5/09	Order (D.E. 400)			
65	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<i>Jane Doe v. United States of America (CVRA)</i> USDC S.D. Fla. Case No. 08-80736-CIV					
66	7/7/08	Emergency Victim's Petition for Enforcement of Crime Victim's Rights Act, 18 U.S.C. Section 3771 (D.E. 1)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
67	8/14/08	Transcript of Hearing Before the Honorable Kenneth A. Marra			
<i>Rothstein Rosenfeldt Adler and Stuart Rosenfeldt v. Scott W. Rothstein.</i> 17th Judicial Circuit Broward County Case No. 2009-CA-059301-AXXXCE					
68	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
69	11/3/09	Amended Complaint			
70	Misc.	All testimony, deposition transcripts, exhibits and videotapes			
<i>In re Rothstein Rosenfeldt Adler, P.A.</i> USBC S.D. Fla. Case No. 09-34791-RBR					
71	11/16/09	Motion of the U.S. Trustee for an Order Directing the Appointment of a Chapter 11 Trustee and Objection to Retention of Chief Restructuring Officer (D.E. 8)			
72	12/1/09	Verified Complaint for Damages and Other Relief (D.E. 74)			
73	2/23/11	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman			
74	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein (12/12/11); b. Jack (John) Scarola's (7/2/13); and c. Russell Adler (10/28/10).			
<i>United States of America v. Scott Rothstein – Forfeiture Action</i> USDC S.D. Fla. Case No. 09-CV-61780-Zloch-Rosenbaum					
75	11/9/09	Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 1)			
76	11/23/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 14)			
77	11/27/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 19)			
<i>The Florida Bar Matters</i>					
78	11/9/09	The Florida Bar Inquiry/Complaint Form Jeffrey Epstein filed against Bradley J. Edwards, William Berger and Scott Rothstein			
79	11/25/09	Approval of Scott Rothstein's disbarment; <i>The Florida Bar v. Scott Walter Rothstein</i> ; Supreme Court Case No. SC09-2146			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
80	6/24/10	The Florida Bar's Notice of No Probable Cause and Letter of Advice to Accused; <i>In re Complaints by Jeffrey Epstein and the Florida Bar against Bradley James Edwards</i> ; Case No. 2010-50,746(09B)			
<i>United States of America v. Scott W. Rothstein</i> USDC S.D. Fla. Case No. 09-60331					
81	12/1/09	Information charging Scott W. Rothstein			
82	1/25/10	Plea Agreement between the United States of America and Scott W. Rothstein			
83	9/26/17	Government's Motion to Withdraw its Motion for Reduction of Sentence			
<i>Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.</i> 17th Judicial Circuit, Broward County, Florida Case No. 09-062943					
84	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses			
85	11/20/09	Complaint			
86	11/25/09	Amended Complaint			
87	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein's testimony (12/12/11, 12/19/11, 12/20/11, 12/21/11, 12/22/11)			
Rothstein Rosenfeldt Adler - Communication					
88	4/8/09 2:58 p.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Mark S. Nurik (01404)			
89	4/22/09 4:51 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01620)			
90	4/24/09 5:07 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01446)			
91	5/19/09 10:33 a.m.	E-mail from William J. Berger to Bradley J. Edwards, Russell Adler, Steven R. Jaffe, Matthew D. Weissing and Gary M. Farmer (01726)			
92	5/19/09 12:00 p.m.	E-mail from Susan K. Stirling to Bradley J. Edwards (05725)			
93	5/19/09 12:03 p.m.	E-mail from Bradley J. Edwards to Russel Adler (01574)			
94	5/22/09 12:13 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01449)			
95	5/22/09 12:21 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05148)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
96	5/26/09 4:57 p.m.	E-mail from Bradley J. Edwards to Timothy Malloy (01450)			
97	5/26/09 5:33 p.m.	E-mail from Timothy Malloy to Bradley J. Edwards (05151)			
98	5/28/09 2:13 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05161)			
99	5/28/09 2:16 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02241-02242)			
100	6/3/09 5:17 p.m.	E-mail from William J. Berger to Grace Torres, cc Russell Adler and Bradley J. Edwards (01735)			
101	6/4/09 10:43 a.m.	E-mail from Bradley J. Edwards to Susan K. Stirling, cc Carla Martinez (01410)			
102	6/9/09 3:10 p.m.	E-mail from Bradley J. Edwards to Eric Glasser (06655)			
103	6/23/09 12:52 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (Palm Beach Daily News) (01632)			
104	6/23/09 1:03 p.m.	E-mail from Bradley J. Edwards to Paul Cassell (01634)			
105	6/23/09 1:13 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05239)			
106	6/23/09 1:16 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05203)			
107	6/23/09 1:29 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05277-05278)			
108	6/23/09 2:31 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05207-05208)			
109	6/23/09 2:41 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05324-05325)			
110	6/23/09 2:53 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05212-05213)			
111	6/23/09 3:08 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05344-05346)			
112	6/23/09 3:12 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05215-05217)			
113	6/23/09 4:39 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05368-05369)			
114	6/23/09 5:22 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05220-05221)			
115	6/23/09 5:28 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05387-05388)			
116	6/24/09 9:39 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (05224-05225)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
117	7/8/09 3:36 p.m.	E-mail from Bradley J. Edwards to Russell Adler; William J. Berger and Steven R. Jaffee (01462)			
118	7/13/09 2:28 p.m.	E-mail from Michele Dargan (Palm Beach Daily News) to Bradley J. Edwards (08404)			
119	7/4/09 4:37 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02204)			
120	7/15/09 1:17 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (04906)			
121	7/15/09 1:22 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (04905)			
122	7/18/09 4:10 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01661)			
123	7/21/09 8:21 p.m.	E-mail from Bradley J. Edwards to Michele Leone (01352)			
124	7/22/09 11:22 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01479)			
125	7/22/09 11:35 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05803)			
126	7/22/09 1:29 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards (01662)			
127	7/22/09	Letter from Bradley J. Edwards re cross noticing depositions			
128	7/26/09 5:28 p.m.	E-mail from Priscila A. Nascimento to Scott Rothstein, cc Amy N. Howard and Adelita Cabello (25860-25863)			
129	7/28/09 8:59 a.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01483)			
130	7/28/09 8:59 a.m.	E-mail from Susan Spencer Wendel to Bradley J. Edwards (03070)			
131	7/28/09 9:28 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01486)			
132	7/28/09 10:00 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05848)			
133	7/29/09 1:13 p.m.	E-mail from Cara L. Holmes to Bradley J. Edwards (08420)			
134	7/28/09 1:47 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (11075-11076)			
135	7/29/09 1:49 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05852-05853)			
136	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05535-05536)			
137	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (11320-11322)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
138	7/30/09 6:06 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05538-05539)			
139	7/31/09 11:20 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (11080-11082)			
140	8/10/09 6:59 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06965)			
141	8/10/09 7:23 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06967)			
142	8/11/09 8:43 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06968-06969)			
143	8/11/09 9:29 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06963-06964)			
144	8/11/09 10:10 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06970-06971)			
145	8/11/09 12:34 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06959-06960)			
146	8/14/09 4:40 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06975)			
147	8/15/09 2:41 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Ken Jenne (01685)			
148	8/15/09 6:00 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06972-06973)			
149	8/17/09 10:32 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06976-06977)			
150	8/17/09 10:42 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (02442)			
151	8/19/09 2:47 p.m.	E-mail from Bradley J. Edwards to Ken Jenne (01501)			
152	8/24/09 7:38 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (01506)			
153	8/25/09 11:03 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (05952-05953)			
154	8/26/09 9:56 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (02269)			
155	8/31/09 10:58 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02895)			
156	9/2/09 12:54 p.m.	E-mail from Elizabeth Villar to Bradley J. Edwards and Ken Jenne, cc Jacquie Johnson, Pat Roberts and Mike Fisten (01376)			
157	9/7/09 1:39 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07612-07613)			
158	9/7/09 6:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02595-02596)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
159	9/7/09 6:49 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07614-07615)			
160	9/7/09 7:00 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07605-07606)			
161	9/7/09 8:12 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07607-07608)			
162	9/7/09 10:55 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07609-07611)			
163	9/8/09 11:43 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04015)			
164	9/8/09 11:50 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07646)			
165	9/8/09 11:53 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07647)			
166	9/8/09 12:04 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07676-07677)			
167	9/8/09 1:59 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07674-07675)			
168	9/8/09 2:04 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07678-07679)			
169	9/8/09 2:36 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07684-07685)			
170	9/8/09 2:42 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07682-07683)			
171	9/8/09 2:49 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07695-07697)			
172	9/8/09 3:25 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07680-07681)			
173	9/8/09 7:51 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07686-07688)			
174	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07689-07691)			
175	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07692-07694)			
176	9/15/09 1:08 p.m.	E-mail from Bradley J. Edwards to Elizabeth Villar, cc Ken Jenne and Pat Roberts (01361)			
177	9/18/09 12:35 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01318)			
178	9/18/09 12:35 p.m.	E-mail from Jacquie Johnson to Ann Marie Villafana, cc Bradley J. Edwards (01583)			
179	9/18/09 1:01 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (05619-05620)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
180	9/18/09 2:37 p.m.	E-mail from Bradley J. Edwards to Beth S. Williamson (01144)			
181	9/18/09 2:55 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (01280-01288)			
182	9/21/09 1:37 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03081)			
183	9/23/09 8:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04320)			
184	9/24/09 6:31 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04321)			
185	9/24/09 6:53 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04318-04319)			
186	9/24/09 8:45 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (10586-10589)			
187	9/28/09 8:09 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards, cc Renee/Carlos Morrison (02913)			
188	9/28/09 10:06 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (06789)			
189	9/28/09 10:20 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (06788)			
190	9/28/09 11:45 p.m.	E-mail from Mike Fisten to Conchita Sarnoff (19986-19987)			
191	9/29/09 10:06 a.m.	E-mail from Bradley J. Edwards to Ken Jenn and Elizabeth Villar (01754)			
192	10/2/09 10:41 a.m.	E-mail from Bradley J. Edwards to Nigel Rosser (06191)			
193	10/2/09 11:08 a.m.	E-mail from Nigel Rosser to Bradley J. Edwards (06189-06190)			
194	10/2/09 4:28 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06979-06980)			
195	10/2/09 4:52 p.m.	E-mail from Bradley J. Edwards to Mike Fisten (02440-02441)			
196	10/2/09 4:53 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff, cc Jacquie Johnson (06974)			
197	10/2/09 6:14 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards, cc Jacquie Johnson (06955-06956)			
198	10/8/09 4:11 p.m.	E-mail from Bradley J. Edwards to Richard Johnson (06961)			
199	10/13/09 2:17 p.m.	E-mail from Grant J. Smith to Scott Rothstein, Bradley J. Edwards, Ken Jenne, Kip Hunter and Russell Adler, cc Grant J. Smith (26507)			
200	10/13/09 2:27 p.m.	E-mail from Mike Fisten to Bradley J. Edwards (01727)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
201.	10/13/09 7:00 p.m.	E-mail from Bradley J. Edwards to Jacquie Johnson, cc Mike Fisten (01744)			
202.	10/14/09 7:39 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (03190)			
203.	10/14/09 9:02 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03189)			
204.	10/14/09 10:42 a.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Jacquie Johnson (01099)			
205.	10/14/09 12:20 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Jacquie Johnson (01741)			
206.	10/16/09 5:29 a.m.	E-mail from ABA Journal Weekly Newsletter to Scott Rothstein (25864-25865)			
207.	10/19/09 10:46 a.m.	E-mail from Bradley J. Edwards to Ken Jenne (01704)			
208.	10/20/09 1:01 p.m.	E-mail from George Rush to Bradley J. Edwards (01433)			
209.	10/20/09 3:07 p.m.	E-mail from Ken Jenne to Scott Rothstein (26506)			
210.	10/22/09 11:52 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (01391)			
211.	10/22/09 2:52 p.m.	E-mail from Jacquie Johnson to Russell Adler, Cara L. Holmes, Mike Fisten, Michael J. Wheeler, Marc S. Nurik, William J. Berger, Bradley J. Edwards, Barry J. Stone and Ken Jenne, cc Robert C. Buschel (01392)			
212.	10/22/09 4:10 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards, Marc S. Nurik, Michael J. Wheeler, Cara L. Holmes, William J. Berger, Russell Adler and Robert C. Buschel (01307)			
213.	10/26/09 7:46 a.m.	E-mail from William J. Berger to Pat Carter and Bradley J. Edwards, cc Grace Torres and Jacquie Johnson (01380)			
214.	10/29/09 2:16 p.m.	E-mail from Pat Diaz to Bradley J. Edwards (01623)			
215.	10/30/09 10:01 a.m.	E-mail from Debra Villegas to Scott Rothstein (26304-26305)			
216.	10/30/09 10:03 a.m.	E-mail from Russell Adler to Jacquie Johnson and Bradley J. Edwards (01625)			
Billing					
217.	12/21/09	Contract for Services between Searcy Denny Scarola Barnhart & Shipley and Bradley J. Edwards			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
218	N/D	Spreadsheet of Brad Edwards' Time in <i>Edwards adv. Epstein</i> (BJE00000104 – BJE00000156)			
219	7/14/10 - 1/16/13	Searcy Denney Scarola Barnhart and Shipley's Invoices for Disbursements to Bradley J. Edwards (BJE000000039 – BJE000000103)			
220	1/1/80 – 2/15/13	Search Denney Scarola Barnhart and Shipley's Matter Ledger Report (BJE000000006 – BJE000000038)			
Miscellaneous					
221	10/23/09	Rothstein Rosenfeldt Adler's Firm Directory			
222	11/9/17	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s "Our Attorneys" website printout (https://www.pathtojjustice.com/about-us/attorneys/)			
223	12/1/09	Criminal Complaint; <i>United States of America v. Alfredo Rodriguez</i> ; USDC S.D. Fla. Case No. 09-8308			
224	4/23/10	Affidavit of Bradley James Edwards			
225	9/21/10	Affidavit of Bradley James Edwards			
226	Misc.	Subpoenas and Notices of Deposition for Alan Dershowitz, David Copperfield and Leonard Baird			
227	11/16/17	Critton Luttier Coleman, LLP's website printout for Robert D. Critton Jr. (https://www.lawclc.com/team_members/Robert-d-critton-jr/)			
228	11/16/17	Fowler White Burnett, P.A.'s website printout for Joseph L. Ackerman, Jr. (http://www.fowler-white.com/Attorneys/id/3/read)			
Bradley J. Edwards					
229	N/D	The National Crime Victim Bar Association presentation excerpt of article by Bradley J. Edwards: <i>Who is Responsible for Child Sexual Abuse</i>			
230	N/D	The Florida Bar's website member profile printout for Bradley James Edwards			
231	N/D	National Association of Distinguished Counsel biographical information for Bradley J. Edwards			
232	5/14/13	The National Trial Lawyers Top 40 Under 40 Directory (http://www.thenationaltriallawyers.org/top-40-under-40-directory/?last_name+Edwards&city=&state=FL&x=18&y=17)			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
233	5/14/13	The National Trial Lawyers Profile View of Brad Edwards (http://www.thenationaltriallawyers.org/profile-view/Brad/Edwards/4409/)			
234	5/14/13	Lawyers.com website information for Bradley J. Edwards (http://www.lawyers.com/florida/fort-lauderdale/Bradley-J-Edwards-3489098-a/)			
235	10/30/04	Kubicki Draper's website attorney information for Brad J. Edwards			
236	10/30/05	Kubicki Draper's website attorney information for Brad J. Edwards:			
237		The American Registry Website printouts of recognitions received by Bradley J. Edwards			
238	5/7/12	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)			
239	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)			
240	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/press-releases/)			
241	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. website printout (http://www.abuseandassault.com/Abuse_Home)			
242	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Notable_Cases)			
243	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards (www.pathtojustice.com/attorneys/brad-edwards/#.UZJOPpWTOX0)			
244	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/archived-press-releases/#.UZJTy5WTOX0)			
245		Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards with referenced articles			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
A.	Winter 2014	Journal of Criminal Law and Criminology. Volume 104; Issue 1. <i>Crime Victims' Rights During Criminal Investigations? Applying the Crime Victims' Rights Act Before Criminal Charges are Filed;</i>			
B.	12/26/15	<u>Politico</u> . <i>Victims in Underage Sex Case Want Prosecutors to Testify</i>			
C.	12/21/15	<u>Palm Beach Daily News</u> . <i>Jeffrey Epstein Sex Scandal: Alan Dershowitz Suffers Setback in Defamation Case</i>			
D.	12/18/15	<u>Palm Beach Daily News</u> . <i>Epstein Victims' Attorneys Seek Partial Victory in Defamation Suit</i>			
E.	12/21/15	<u>Palm Beach Post</u> . <i>Boca-Resident Model Nabs \$13.4 Million Following Six-Year Divorce Battle</i>			
F.	12/17/15	<u>Daily Mail.Com</u> . <i>Florida Model Gets Whopping \$13.4 Million Payout from Real Estate Tycoon Ex-Husband After Nasty Six-Year Divorce Battle</i>			
G.	11/25/15	<u>Palm Beach Daily News</u> . <i>Appellate Court Reverses Palm Beach Sex Offender Jeffrey Epstein's Victory</i>			
H.	11/12/15	<u>Daily Business Review</u> . <i>Attorney's Suit Against Billionaire Allowed as Long as Justices Say It's OK</i>			
I.	7/8/15	<u>Palm Beach Daily News</u> . <i>Judge Keeps Thousands of Epstein Documents Sealed</i>			
J.	6/25/15	<u>WCVB5</u> . <i>Jury Awards \$24 Million to Mass. Widower in Fatal Cabana Crash</i>			
K.	6/24/15	<u>NBC6</u> . <i>Jury Awards 24 Million in Fatal Cabana Crash</i>			
L.	6/24/15	<u>CBS Miami</u> . <i>Jury Awards Millions to Husband of Pregnant Woman Killed by Drunk Driver</i>			
M.	6/25/15	<u>Sun Sentinel</u> . <i>Jury Awards \$24 Million to Widower in Fatal Cabana Crash</i>			
N.	1/8/15	<u>Daily Business Review</u> . <i>The Lawyer Suing Legal Legend Alan Dershowitz Over Sex Offender</i>			
O.	4/21/14	<u>The Washington Post</u> . <i>Eleventh Circuit Rules that Discovery Can Move Forward on My Crime Victims' Rights Act Case</i>			
P.	4/21/14	<u>Palm Beach Daily News</u> . <i>Appeals Court Rules Against Sex Offender. Attorneys for Underage Victims Seek to Overturn "Sweetheart Plea."</i>			
Q.	4/21/14	<u>Sun-Sentinel</u> . <i>Victims Win Right to See Negotiation that Led to 'Lenient' Plea Deal Agreement for Billionaire Sex Offender</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
R.	4/21/14	<u>Palm Beach Post</u> . <i>Appellate Ruling Could Force Feds to Reconsider Sex Charges Against Palm Beacher Epstein</i>			
S.	10/20/13	<u>Palm Beach Daily News</u> . <i>Newest Lawsuit Against Epstein Expected to Include Victim Testimony</i>			
T.	9/10/12	<u>CBS Miami, Exclusive</u> : <i>Sexual Assault Victim Alleges Abuse by Former Youth Pastor</i>			
U.	9/7/12	<u>Sun-Sentinel</u> . <i>Elevator Fall Nets Woman \$13 Million Jury Award</i>			
V.	July 2012	<u>Daily Business Review</u> . <i>Top Florida Verdicts & Settlements of 2011</i>			
W.	6/13/12	<u>Daily Business Review</u> . <i>Suit Accuses Goldrush Strip Club of Scheme to Bilk Professionals</i>			
X.	4/22/11	<u>Palm Beach Daily Business Review</u> . <i>Jeffrey Epstein Amends Lawsuit; Claims Victims' Attorney Threatened to Depose His Friends</i>			
246	8/10/16	Farmer Jaffe Weissing's Facebook page with referenced articles			
A.	5/22/16	<u>Lawnewz.com</u> . <i>The Shameful Way Feds Protected Convicted Pedophile Billionaire Jeffrey Epstein</i>			
B.	5/13/16	<u>Fox News</u> . <i>Flight Logs Show Bill Clinton Flew on Sex Offender's Jet Much More than Previously Known</i>			
C.	2/11/16	<u>Sun-Sentinel</u> . <i>Feds Deceived Us About Billionaire Sex Offender's 'Sweetheart Deal' Teen Victims Say</i>			
D.	2/12/16	<u>NBC News</u> . <i>Lawyers: Victims Not Told of 'Sweetheart Deal' for Jeffrey Epstein</i>			
E.	2/11/16	<u>NY Daily News</u> . <i>Jeffrey Epstein Accusers Sue Feds Over Hidden Non-Prosecution 'Conspiracy'</i>			
F.	4/23/14	Farmer, Jaffe. <i>Appeals Court Rules in Favor of Crime Victims' Rights in Registered Pedophile Jeffrey E. Epstein Case</i>			
G.	4/23/14	<u>Daily Business Review</u> . <i>Prosecutors Must Turn Over Docs in Billionaire Sex Offender Jeffrey Epstein Case</i>			
247	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Court, Case No. 16-1995-MM-000074-AXXA-MA			
248	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Case No. 16-1998-CF-004394-AXXX-MA			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
249	8/14/07	Exemption and/or Limitation Exclusion – Tax Assessment of \$3,507.72			
250	1/7/08	Notice of Satisfaction of Lien Relative to Tax Exemption			
251	Misc.	Docket and all court filings referenced therein; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
252	1/21/10	Petition/Complaint; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
253	2/18/10	Bradley J. Edwards' Answer and Affirmative Defenses; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
254	8/11/10	Notice of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
255	8/11/10	Final Summary Judgment of Mortgage Foreclosure; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
256	10/22/10	Certificate of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
257	11/2/10	Certificate of Title; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE			
258	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
259	3/17/10	Petition/Complaint; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
260	10/4/11	Final Summary Judgment of Mortgage Foreclosure; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
261	10/10/11	Notice of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
262	1/5/12	Certificate of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
263	1/18/12	Certificate of Title; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE			
264	Misc.	Docket and all court filings referenced therein; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
265	12/8/11	Complaint; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
266	1/25/12	Stipulation for Settlement; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427			
267	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
268	3/22/12	Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
269	5/18/12	Bradley J. Edwards' Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
270	10/3/12	Order Denying Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
271	10/26/12	Answer to Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
272	11/20/12	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
273	3/15/13	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE			
274		Corporate Detail Printout from Sunbiz.org for The Law Office of Brad Edwards & Associates, LLC			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
275	4/16/07	Articles of Organization for Florida Limited Liability Company for The Law Office of Brad Edwards & Associates, LLC			
276	1/25/08	2008 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates			
277	3/11/09	2009 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates			
278		Florida Bar Rules including, but not limited to, Florida Bar Rule 4-7.21			
279	3/3/08	Complaint; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 1)			
280	6/17/08	Omnibus Order on Defendants' Motion to Dismiss; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 79)			
281	8/10/10	U.S. Court of Appeals Opinion; <i>Donald D. Baker v. City of Hollywood, et al.</i> ; Case No. 08-14924 & 08-15602			
282	12/9/04	New Times Broward Palm-Beach: <i>Tale of the Tape</i>			
Experts					
283	10/20/17	Dr. Bernard J. Jansen's Expert Report with attachments			
284	Misc.	All documents produced, or relied upon or referenced by Dr. Bernard J. Jansen in preparing his 10/20/17 Report			
285	9/9/16	Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)			
286	11/30/16	Supplemental Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)			
287	Misc.	All public records, news articles and prior testimony of Dr. Bernard J. Jansen			
Other Articles					
288	11/1/09	<i>Kendall Coffey: Law Firm Victimized by Scott Rothstein</i>			
289	11/2/09	<i>Legal Junkies. WSJ Law Blog – Rothstein Rosenfeldt Adler, Ft. Lauderdale, Law Firm Dissolution, Ponzi Scheme</i>			
290	11/2/09	New Times Broward-Palm Beach. <i>Chief Judge: Scott Rothstein's Firm Has "No Money" and is Going into Receivership</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
291	11/3/09	<i>The New York Times: Fraud Accusations Against Florida Lawyer Set Off a Race to Return His Donations</i>			
292	11/3/09	<i>Rothstein Returns After Contemplating Suicide, Partner Says</i>			
293	11/3/09	<i>Florida Law Firm Asks to be Dissolved</i>			
294	11/3/09	<i>Sun Sentinel: Scott Rothstein's Investment Deals Seemed Too Good to be True</i>			
295	11/5/09	<i>Funds News: FBI Agents Search Law Firm in Missing Funds Probe</i>			
296	11/6/09	<i>New Times Broward-Palm Beach: Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy</i>			
297	11/6/09	<i>Rothstein Accomplice Still on Lam</i>			
298	11/7/09	<i>Tour of Scott Rothstein's Office Reveals Gallery of Who's Who</i>			
299	11/12/09	<i>Sun Sentinel: FBI Doubts Rothstein Ran a Ponzi Scheme Alone</i>			
300	11/13/09	<i>Palm Beach Post: FBI Doubts Rothstein's Scheme a 'One-Man Show'</i>			
301	11/13/09	<i>Sun Sentinel: High-Ranking Police Officers Guarded Over Rothstein</i>			
302	11/17/09	<i>Inside the Rothstein Swindle, Part I</i>			
303	11/17/09	<i>Sun Sentinel: Rothstein Asks to Voluntarily Give Up Law License</i>			
304	11/17/09	<i>Rothstein and Dreier: How Much Alike?</i>			
305	11/18/09	<i>Inside the Rothstein Swindle, Part II</i>			
306	11/18/09	<i>Former RAA Attorneys Take New Jobs</i>			
307	11/20/09	<i>Scherer Files Suit Against Rothstein, et al.</i>			
308	11/20/09	<i>Article by Paul Brinkman</i>			
309	11/21/09	<i>Rothstein Feeder George Levin's Ugly Past</i>			
310	11/22/09	<i>George Levin was Rothstein's Whale</i>			
311	11/23/09	<i>Rothstein Associate Levy Got Protection from Plantation Cops</i>			
312	11/23/09	<i>Main Line Firm's Clients Invested \$30 Million with 'Ponzi' Lawyer</i>			
313	11/23/09	<i>Sun-Sentinel: Scott Rothstein: "You're in Town Full of Thieves"</i>			
314	11/24/09	<i>Miami Herald, Feds: Scott Rothstein Ponzi Scheme Paid Salaries at Law Firm</i>			
315	11/26/09	<i>The Rothstein Wires</i>			
316	11/13/10	<i>Sun Sentinel: Florida Bar Looking at 35 Former Attorneys from Rothstein's Firm</i>			

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
317	July 2010	<u>Sun Sentinel</u> . 22 Former Scott Rothstein Attorneys Cleared by the Florida Bar			
318	10/22/10	<u>South Florida Business Journal</u> . A Year After Rothstein, Many Questions Unanswered.			
319	10/31/10	<u>The Florida Bar</u> . Scott Rothstein Scandal: One Year Later			
320	1/21/13	<u>Forbes</u> . Rothstein Expose Details Sex, Murder, and Corruption Behind Florida's Largest Ponzi Scheme			
321	10/13/14	<u>Five Years on, Rothstein's Ponzi Still Resonates</u>			
322	10/3/17	<u>Palm Beach Daily News</u> . Epstein Paid Three Women \$5.5 Million to End Underage Sex Lawsuits			
General					
323		All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party			
324		All court dockets and filings in all matters against Jeffrey Epstein relating to any victim's claims			
325		All prior testimony, statements, reports and affidavits of any witness or experts			
326		All charts/analyses prepared based on documents exchanged or later discovered			
327		All foundation exhibits			
328		All rebuttal and impeachment exhibits			
329		Demonstrative aids and exhibits including, but not limited to, charts, timelines, diagrams, models, surveys, photographs and blow-ups			
330		All newly discovered documents/exhibits			
331		Any and all exhibits listed by Bradley J. Edwards (by identifying these as exhibits, Plaintiff is not waiving his right to object to any of Edwards' exhibits introduced at trial)			

Plaintiff/Counter-Defendant reserves his right to supplement this Exhibit List.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on November 16, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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<p>Tonja Haddad Coleman 315 S.E. Seventh Street, Suite 301 Ft. Lauderdale, FL 33301 tonja@tonjahaddad.com efiling@tonjahaddad.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>	<p>Fred Haddad Haddad & Navarro, PLLC 1 Financial Plaza, Suite 2612 Fort Lauderdale, FL 33394 dee@haddadandnavarrolaw.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>
<p>Jack A. Goldberger Atterbury, Goldberger & Weiss, P.A. 250 Australian Avenue S., Suite 1400 West Palm Beach, FL 33401 jgoldberger@agwpa.com smahoney@agwpa.com <i>Co-Counsel for Plaintiff/Counter-Defendant</i> Jeffrey Epstein</p>	

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendants.

**OBJECTIONS TO COUNTER-DEFENDANT JEFFREY EPSTEIN'S
AMENDED EXHIBIT LIST**

Bradley J. Edwards, by and through his undersigned counsel, files his Objections to Counter-Defendant Jeffrey Epstein's Amended Exhibit List dated November 16, 2017, as follows:

INDEX TO OBJECTIONS

- | | |
|--|---|
| 0. No Objection | 5. Privileged |
| 1. All objections | 6. Opinion |
| 2. All objections, except authenticity | 7. Hearsay |
| 3. Irrelevant or immaterial | 8. Authenticity lacking |
| 4. Probative value substantially outweighed by danger of unfair prejudice, confusion of issues, misleading the jury, or needless presentation of cumulative evidence | 9. Other (please identify basis of objection) |

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
<i>Jeffrey Epstein v. Scott Rothstein, Bradley J. Edwards and L.M.</i> 15 th Judicial Circuit Case No. 50-2009-CA-040800XXXXMB					
1	12/7/09	Complaint with Exhibits	0		
2	12/21/09	Answer and Counterclaim of Defendant Bradley J. Edwards	0		
3	1/21/10	Default against Scott Rothstein	0		
4	8/2/10 8/9/10	Stipulation and Order of Dismissal with Prejudice as to L.M., Individually Only	0		
5	3/27/12	Notice of Appearance of Bradley J. Edwards	0		
6	8/16/12	Notice of Voluntary Dismissal Without Prejudice of Bradley J. Edwards	0		
7	1/9/13	Bradley J. Edwards' Fourth Amended Counterclaim	0		
8	9/25/13	Affidavit of Jeffrey Epstein	1		
9	6/30/17	Affidavit of Jeffrey Epstein	1		
10	6/30/17	Jeffrey Epstein's Motion for Summary Judgment, Appendix in Support and all documents cited therein.	1		
11	Misc.	All deposition transcripts, exhibits and videotapes including, but not limited to: a. Bradley J. Edwards (3/23/10; 5/15/13; 10/10/13; 11/10/17) b. Jeffrey Epstein (3/17/10; 1/25/12) c. Scott Rothstein (6/14/12) d. Russell Adler (4/20/11) e. Abrakas Joseph Discala (5/25/11) f. Dean Russell Kretschmar (2/11/11) g. Michael Legamaro (3/11/11) h. Courtney Wild (10/12/17)	2		
12	Misc.	Defendant/Counter-Plaintiff Bradley J. Edwards' Answers, Responses, Objections and Privilege Logs in response to Plaintiff/Counter-Defendant Jeffrey Epstein's Interrogatories, Requests for Admission, Requests for Production, and Subpoenas Duces Tecum	2		
13	Misc.	All documents produced by any party or non-party in this matter	1		
14	Misc.	All documents filed in the court file, including pleadings, motions, responses, affidavits, discovery, and exhibits.	1		
15	Misc.	All hearing transcripts	1		
<i>State of Florida v. Jeffrey Epstein</i> 15 th Judicial Circuit					

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
16	4/24/07	Transcript of Taped Statement of Tatum Miller	1		
17	Misc.	All other testimony, transcripts and statements provided in the matter	1		
<i>L.M. v. Jeffrey Epstein</i> 15 th Judicial Circuit Case No. 50-2008-CA-028051XXXXMB					
18	Misc.	Court docket and all court filings referenced therein	1		
19	9/11/08	Complaint	0		
20	12/23/08	Amended Complaint	0		
21	3/30/09	Notice of Change of Firm and Address	0		
22	4/7/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint	0		
23	8/19/09 9/11/09	Notices of Production from Non Parties: (1) Stephen Alexander, M.D.; (2) Bruce W. Markowitz, M.D.; and (3) Charles J. Galecki, M.D.	2		
24	8/24/09	Notices of Taking Deposition and Subpoenas to (1) Lawrence Paul Visoski, Jr. and (2) David Hart Rogers	2		
25	8/11/09	Plaintiff's Request for Production to Defendant	2		
26	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint	0		
27	5/28/10	Plaintiff's Third Amended Complaint	2		
28	7/22/10	Stipulation of Dismissal With Prejudice	2		
29	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. L.M. (9/24/09; 2/9/10)	1		
<i>L.M. v. Jeffrey Epstein</i> USDC S.D. Fla. Case No. 09-CV-81092					
30	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	2		
31	7/24/09	Complaint and Demand for Jury Trial	0		
32	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 21)	3, 4, 7		
33	Misc.	All testimony, deposition transcripts, exhibits and videotapes.	1		
34		Federal Rule of Civil Procedure, Rule 11	2		
<i>E.W. v. Jeffrey Epstein</i> 15 th Judicial Circuit Case No. 50-2008-CA-028058XXXXMB					
35	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
36	9/10/08	Complaint	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
37	12/23/08	Amended Complaint	0		
38	3/30/09	Notice of Change of Firm and Address	0		
39	4/6/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Amended Complaint	0		
40	6/2/09	Defendant Epstein's Motion for Order to Terminate or Limit Deposition and Response in Opposition to Plaintiff's Amended Motion to Compel for Sanctions	3, 4, 7, 8		
41	7/16/09	Cross Notice of Taking Videotaped Deposition of Alfredo Rodriguez	0		
42	8/19/09	Defendant Epstein's Answer & Affirmative Defenses to Plaintiff's Second Amended Complaint	0		
43	8/10/09	Plaintiff's Request for Entry Upon Land	0		
44	5/28/10	Plaintiff's Third Amended Complaint	3, 4, 7, 8		
45	7/22/10	Stipulation of Dismissal With Prejudice	3, 4, 7, 8		
46	7/29/10	Order Adopting Stipulation and Dismissing Case With Prejudice	3, 4, 7		
47	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. E.W. (5/6/10)	1		
Jane Doe v. Jeffrey Epstein USDC S.D. Fla. Case No. 08-CV-80893					
48	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
49	8/12/08	Complaint (D.E. 1)	0		
50	3/26/09	Defendant Epstein's Motion to Stay and/or Continue Action for Time Certain Based on Parallel Civil and Criminal Proceedings with Incorporated Memorandum of Law (D.E. 24)	3, 4, 7, 8		
51	4/9/09	Notice of Change of Address and Firm Affiliation (D.E. 30)	0		
52	4/9/09	Plaintiff's Motion to Strike References to Non-Prosecution Agreement or, in the Alternative, to Lift Protective Order Barring Jane Doe's Attorney's from Revealing Provisions in the Agreement (D.E. 32)	0		
53	4/17/09	Plaintiff's First Amended Complaint (D.E. 38)	0		
54	5/14/09	Order Consolidating Cases for Purposes of Discovery and Procedural Motions that Relate to Multiple Cases (D.E. 56)	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
55	7/28/09 to 10/22/09	Notices of Taking Deposition and Subpoenas to: Ghislane Noelle Maxwell, Leslie Wexler, Donald Trump, Mark Epstein, Nadia Marcinkova, Jean Luc Bruhel, Sarah Kellen, Michael Freidman, Rosalie Freidman, and Michael Sanka	0		
56	7/20/10	Stipulation of Dismissal With Prejudice (D.E. 210)	3, 4, 7, 8		
57	7/20/10	Final Order of Dismissal With Prejudice (D.E. 211)	3, 4, 7, 8		
58	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
Jane Doe 2 v. Jeffrey Epstein (Consolidated Action) USDC S.D. Fla. Case No. 08-CV-80119					
59	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
60	6/19/09	Plaintiff Jane Doe's Motion for Injunction Restraining Fraudulent Transfer of Assets Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 165)	0		
61	7/23/09	Plaintiff Jane Doe's Reply Memorandum in Support of Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein and to Post a \$15 Million Bond to Secure Potential Judgment (D.E. 217)	0		
62	10/16/09	Plaintiff Jane Doe's Notice that Additional Evidence of Epstein's Fraudulent Asset Transfers Will be Filed Shortly, etc. (D.E. 357)	0		
63	10/30/09	Plaintiff Jane Doe's Motion for Leave to Provide Recently-Obtained Deposition Testimony and Affidavit Demonstrating Fraudulent Transfers by Epstein in Support of Motion for Appointment of a Receiver to Take Charge of Property of Epstein and Incorporated Supporting Memo of Law (D.E. 386)	0		
64	11/5/09	Order (D.E. 400)	3, 4, 7		
65	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
Jane Doe v. United States of America (CVRA) USDC S.D. Fla. Case No. 08-80736-CIV					
66	7/7/08	Emergency Victim's Petition for Enforcement of Crime Victim's Rights Act, 18 U.S.C. Section 3771 (D.E. 1)	0		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
67	8/14/08	Transcript of Hearing Before the Honorable Kenneth A. Marra	3, 4, 7, 8		
<i>Rothstein Rosenfeldt Adler and Stuart Rosenfeldt v. Scott W. Rothstein</i> 17th Judicial Circuit Broward County Case No. 2009-CA-059301-AXXXCE					
68	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
69	11/3/09	Amended Complaint	3, 4, 7, 8		
70	Misc.	All testimony, deposition transcripts, exhibits and videotapes	1		
<i>In re Rothstein Rosenfeldt Adler, P.A.</i> USBC S.D. Fla. Case No. 09-34791-RBR					
71	11/16/09	Motion of the U.S. Trustee for an Order Directing the Appointment of a Chapter 11 Trustee and Objection to Retention of Chief Restructuring Officer (D.E. 8)	3, 4, 7, 8		
72	12/1/09	Verified Complaint for Damages and Other Relief (D.E. 74)	3, 4, 7, 8		
73	2/23/11	Privilege Log of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman	3, 4, 7, 8		
74	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein (12/12/11); b. Jack (John) Scarola's (7/2/13); and c. Russell Adler (10/28/10).	1		
<i>United States of America v. Scott Rothstein – Forfeiture Action</i> USDC S.D. Fla. Case No. 09-CV-61780-Zloch-Rosenbaum					
75	11/9/09	Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 1)	3, 4, 7, 8		
76	11/23/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 14)	3, 4, 7, 8		
77	11/27/09	Amended Verified Complaint for Forfeiture <i>in Rem</i> (D.E. 19)	3, 4, 7, 8		
<i>The Florida Bar Matters</i>					
78	11/9/09	The Florida Bar Inquiry/Complaint Form Jeffrey Epstein filed against Bradley J. Edwards, William Berger and Scott Rothstein	0		
79	11/25/09	Approval of Scott Rothstein's disbarment; <i>The Florida Bar v. Scott Walter Rothstein</i> ; Supreme Court Case No. SC09-2146	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
80	6/24/10	The Florida Bar's Notice of No Probable Cause and Letter of Advice to Accused; <i>In re Complaints by Jeffrey Epstein and the Florida Bar against Bradley James Edwards</i> ; Case No. 2010-50,746(09B)	0		
<i>United States of America v. Scott W. Rothstein</i> USDC S.D. Fla. Case No. 09-60331					
81	12/1/09	Information charging Scott W. Rothstein	3, 4, 7, 8		
82	1/25/10	Plea Agreement between the United States of America and Scott W. Rothstein	3, 4, 7, 8		
83	9/26/17	Government's Motion to Withdraw its Motion for Reduction of Sentence	3, 4, 7, 8		
<i>Razorback Funding, LLC, et al. v. Scott W. Rothstein, et al.</i> 17th Judicial Circuit, Broward County, Florida Case No. 09-062943					
84	Misc.	Court docket, all court filings referenced therein and all discovery and discovery responses	1		
85	11/20/09	Complaint	3, 4, 7, 8		
86	11/25/09	Amended Complaint	3, 4, 7, 8		
87	Misc.	All testimony, deposition transcripts, exhibits and videotapes including, but not limited to: a. Scott W. Rothstein's testimony (12/12/11, 12/19/11, 12/20/11, 12/21/11, 12/22/11)	1		
<i>Rothstein Rosenfeldt Adler - Communication</i>					
88	4/8/09 2:58 p.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Mark S. Nurik (01404)	1		
89	4/22/09 4:51 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01620)	3, 4, 5, 8		
90	4/24/09 5:07 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01446)	3, 4, 5, 8		
91	5/19/09 10:33 a.m.	E-mail from William J. Berger to Bradley J. Edwards, Russell Adler, Steven R. Jaffe, Matthew D. Weissing and Gary M. Farmer (01726)	1		
92	5/19/09 12:00 p.m.	E-mail from Susan K. Stirling to Bradley J. Edwards (05725)	1		
93	5/19/09 12:03 p.m.	E-mail from Bradley J. Edwards to Russel Adler (01574)	3, 4, 5, 8		
94	5/22/09 12:13 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01449)	3, 4, 5, 8		
95	5/22/09 12:21 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05148)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
96	5/26/09 4:57 p.m.	E-mail from Bradley J. Edwards to Timothy Malloy (01450)	3, 4, 5, 8		
97	5/26/09 5:33 p.m.	E-mail from Timothy Malloy to Bradley J. Edwards (05151)	1		
98	5/28/09 2:13 p.m.	E-mail from Susan Spencer Wendell to Bradley J. Edwards (05161)	1		
99	5/28/09 2:16 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02241-02242)	3, 4, 5, 8		
100	6/3/09 5:17 p.m.	E-mail from William J Berger to Grace Torres, cc Russell Adler and Bradley J. Edwards (01735)	1		
101	6/4/09 10:43 a.m.	E-mail from Bradley J. Edwards to Susan K. Stirling, cc Carla Martinez (01410)	3, 4, 5, 8		
102	6/9/09 3:10 p.m.	E-mail from Bradley J. Edwards to Eric Glasser (06655)	3, 4, 5, 8		
103	6/23/09 12:52 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (Palm Beach Daily News) (01632)	3, 4, 5, 8		
104	6/23/09 1:03 p.m.	E-mail from Bradley J. Edwards to Paul Cassell (01634)	3, 4, 5, 8		
105	6/23/09 1:13 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05239)	1		
106	6/23/09 1:16 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05203)	3, 4, 5, 8		
107	6/23/09 1:29 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05277-05278)	1		
108	6/23/09 2:31 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05207-05208)	3, 4, 5, 8		
109	6/23/09 2:41 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05324-05325)	1		
110	6/23/09 2:53 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05212-05213)	3, 4, 5, 8		
111	6/23/09 3:08 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05344-05346)	1		
112	6/23/09 3:12 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05215-05217)	3, 4, 5, 8		
113	6/23/09 4:39 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05368-05369)	1		
114	6/23/09 5:22 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05220-05221)	3, 4, 5, 8		
115	6/23/09 5:28 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05387-05388)	1		
116	6/24/09 9:39 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (05224-05225)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
117	7/8/09 3:36 p.m.	E-mail from Bradley J. Edwards to Russell Adler, William J. Berger and Steven R. Jaffee (01462)	3, 4, 5, 8		
118	7/13/09 2:28 p.m.	E-mail from Michele Dargan (Palm Beach Daily News) to Bradley J. Edwards (08404)	1		
119	7/4/09 4:37 p.m.	E-mail from Bradley J. Edwards to William J. Berger (02204)	3, 4, 5, 8		
120	7/15/09 1:17 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (04906)	3, 4, 5, 8		
121	7/15/09 1:22 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (04905)	1		
122	7/18/09 4:10 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01661)	3, 4, 5, 8		
123	7/21/09 8:21 p.m.	E-mail from Bradley J. Edwards to Michele Leone (01352)	3, 4, 5, 8		
124	7/22/09 11:22 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01479)	3, 4, 5, 8		
125	7/22/09 11:35 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05803)	1		
126	7/22/09 1:29 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards (01662)	1		
127	7/22/09	Letter from Bradley J. Edwards re cross noticing depositions	3, 4, 5, 8		
128	7/26/09 5:28 p.m.	E-mail from Priscila A. Nascimento to Scott Rothstein, cc Amy N. Howard and Adelita Cabello (25860-25863)	1		
129	7/28/09 8:59 a.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (01483)	3, 4, 5, 8		
130	7/28/09 8:59 a.m.	E-mail from Susan Spencer Wendel to Bradley J. Edwards (03070)	1		
131	7/28/09 9:28 a.m.	E-mail from Bradley J. Edwards to Michele Dargan (01486)	3, 4, 5, 8		
132	7/28/09 10:00 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (05848)	1		
133	7/29/09 1:13 p.m.	E-mail from Cara L. Holmes to Bradley J. Edwards (08420)	1		
134	7/28/09 1:47 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (11075-11076)	1		
135	7/29/09 1:49 p.m.	E-mail from Michele Dargan to Bradley J. Edwards (05852-05853)	1		
136	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05535-05536)	3, 4, 5, 8		
137	7/30/09 2:36 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (11320-11322)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
138	7/30/09 6:06 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (05538-05539)	3, 4, 5, 8		
139	7/31/09 11:20 a.m.	E-mail from Michele Dargan to Bradley J. Edwards (11080-11082)	1		
140	8/10/09 6:59 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06965)	3, 4, 5, 8		
141	8/10/09 7:23 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06967)	1		
142	8/11/09 8:43 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06968-06969)	3, 4, 5, 8		
143	8/11/09 9:29 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06963-06964)	1		
144	8/11/09 10:10 a.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06970-06971)	3, 4, 5, 8		
145	8/11/09 12:34 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06959-06960)	1		
146	8/14/09 4:40 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06975)	1		
147	8/15/09 2:41 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Ken Jenne (01685)	3, 4, 5, 8		
148	8/15/09 6:00 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff (06972-06973)	3, 4, 5, 8		
149	8/17/09 10:32 a.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06976-06977)	1		
150	8/17/09 10:42 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (02442)	3, 4, 5, 8		
151	8/19/09 2:47 p.m.	E-mail from Bradley J. Edwards to Ken Jenne (01501)	3, 4, 5, 8		
152	8/24/09 7:38 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (01506)	3, 4, 5, 8		
153	8/25/09 11:03 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (05952-05953)	1		
154	8/26/09 9:56 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (02269)	3, 4, 5, 8		
155	8/31/09 10:58 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02895)	1		
156	9/2/09 12:54 p.m.	E-mail from Elizabeth Villar to Bradley J. Edwards and Ken Jenne, cc Jacquie Johnson, Pat Roberts and Mike Fisten (01376)	1		
157	9/7/09 1:39 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07612-07613)	1		
158	9/7/09 6:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (02595-02596)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
159	9/7/09 6:49 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07614-07615)	3, 4, 5, 8		
160	9/7/09 7:00 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07605-07606)	1		
161	9/7/09 8:12 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07607-07608)	3, 4, 5, 8		
162	9/7/09 10:55 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07609-07611)	1		
163	9/8/09 11:43 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04015)	3, 4, 5, 8		
164	9/8/09 11:50 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07646)	1		
165	9/8/09 11:53 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07647)	3, 4, 5, 8		
166	9/8/09 12:04 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07676-07677)	1		
167	9/8/09 1:59 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07674-07675)	1		
168	9/8/09 2:04 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07678-07679)	3, 4, 5, 8		
169	9/8/09 2:36 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07684-07685)	1		
170	9/8/09 2:42 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07682-07683)	3, 4, 5, 8		
171	9/8/09 2:49 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07695-07697)	1		
172	9/8/09 3:25 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07680-07681)	1		
173	9/8/09 7:51 p.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (07686-07688)	3, 4, 5, 8		
174	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07689-07691)	1		
175	9/8/09 7:53 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (07692-07694)	1		
176	9/15/09 1:08 p.m.	E-mail from Bradley J. Edwards to Elizabeth Villar, cc Ken Jenne and Pat Roberts (01361)	3, 4, 5, 8		
177	9/18/09 12:35 p.m.	E-mail from Bradley J. Edwards to Russell Adler (01318)	3, 4, 5, 8		
178	9/18/09 12:35 p.m.	E-mail from Jacquie Johnson to Ann Marie Villafana, cc Bradley J. Edwards (01583)	1		
179	9/18/09 1:01 p.m.	E-mail from Bradley J. Edwards to Susan Spencer Wendel (05619-05620)	3, 4, 5, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
180	9/18/09 2:37 p.m.	E-mail from Bradley J. Edwards to Beth S. Williamson (01144)	3, 4, 5, 8		
181	9/18/09 2:55 p.m.	E-mail from Bradley J. Edwards to Michele Dargan (01280-01288)	3, 4, 5, 8		
182	9/21/09 1:37 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03081)	1		
183	9/23/09 8:42 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04320)	1		
184	9/24/09 6:31 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (04321)	3, 4, 5, 8		
185	9/24/09 6:53 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (04318-04319)	1		
186	9/24/09 8:45 p.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (10586-10589)	1		
187	9/28/09 8:09 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards, cc Renee/Carlos Morrison (02913)	1		
188	9/28/09 10:06 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (06789)	3, 4, 5, 8		
189	9/28/09 10:20 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (06788)	1		
190	9/28/09 11:45 p.m.	E-mail from Mike Fisten to Conchita Sarnoff (19986-19987)	1		
191	9/29/09 10:06 a.m.	E-mail from Bradley J. Edwards to Ken Jenn and Elizabeth Villar (01754)	3, 4, 5, 8		
192	10/2/09 10:41 a.m.	E-mail from Bradley J. Edwards to Nigel Rosser (06191)	3, 4, 5, 8		
193	10/2/09 11:08 a.m.	E-mail from Nigel Rosser to Bradley J. Edwards (06189-06190)	1		
194	10/2/09 4:28 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards (06979-06980)	1		
195	10/2/09 4:52 p.m.	E-mail from Bradley J. Edwards to Mike Fisten (02440-02441)	3, 4, 5, 8		
196	10/2/09 4:53 p.m.	E-mail from Bradley J. Edwards to Michael Isikoff, cc Jacquie Johnson (06974)	3, 4, 5, 8		
197	10/2/09 6:14 p.m.	E-mail from Michael Isikoff to Bradley J. Edwards, cc Jacquie Johnson (06955-06956)	1		
198	10/8/09 4:11 p.m.	E-mail from Bradley J. Edwards to Richard Johnson (06961)	3, 4, 5, 8		
199	10/13/09 2:17 p.m.	E-mail from Grant J. Smith to Scott Rothstein, Bradley J. Edwards, Ken Jenne, Kip Hunter and Russell Adler, cc Grant J. Smith (26507)	1		
200	10/13/09 2:27 p.m.	E-mail from Mike Fisten to Bradley J. Edwards (01727)	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
201	10/13/09 7:00 p.m.	E-mail from Bradley J. Edwards to Jacquie Johnson, cc Mike Fisten (01744)	3, 4, 5, 8		
202	10/14/09 7:39 a.m.	E-mail from Bradley J. Edwards to Conchita Sarnoff (03190)	3, 4, 5, 8		
203	10/14/09 9:02 a.m.	E-mail from Conchita Sarnoff to Bradley J. Edwards (03189)	1		
204	10/14/09 10:42 a.m.	E-mail from Russell Adler to Bradley J. Edwards, cc Jacquie Johnson (01099)	1		
205	10/14/09 12:20 p.m.	E-mail from Bradley J. Edwards to Mike Fisten, cc Jacquie Johnson (01741)	3, 4, 5, 8		
206	10/16/09 5:29 a.m.	E-mail from ABA Journal Weekly Newsletter to Scott Rothstein (25864-25865)	1		
207	10/19/09 10:46 a.m.	E-mail from Bradley J. Edwards to Ken Jenne (01704)	3, 4, 5, 8		
208	10/20/09 1:01 p.m.	E-mail from George Rush to Bradley J. Edwards (01433)	1		
209	10/20/09 3:07 p.m.	E-mail from Ken Jenne to Scott Rothstein (26506)	1		
210	10/22/09 11:52 a.m.	E-mail from Bradley J. Edwards to Jacquie Johnson (01391)	3, 4, 5, 8		
211	10/22/09 2:52 p.m.	E-mail from Jacquie Johnson to Russell Adler, Cara L. Holmes, Mike Fisten, Michael J. Wheeler, Marc S. Nurik, William J. Berger, Bradley J. Edwards, Barry J. Stone and Ken Jenne, cc Robert C. Buschel (01392)	1		
212	10/22/09 4:10 p.m.	E-mail from Jacquie Johnson to Bradley J. Edwards, Marc S. Nurik, Michael J. Wheeler, Cara L. Holmes, William J. Berger, Russell Adler and Robert C. Buschel (01307)	1		
213	10/26/09 7:46 a.m.	E-mail from William J. Berger to Pat Carter and Bradley J. Edwards, cc Grace Torres and Jacquie Johnson (01380)	1		
214	10/29/09 2:16 p.m.	E-mail from Pat Diaz to Bradley J. Edwards (01623)	1		
215	10/30/09 10:01 a.m.	E-mail from Debra Villegas to Scott Rothstein (26304-26305)	1		
216	10/30/09 10:03 a.m.	E-mail from Russell Adler to Jacquie Johnson and Bradley J. Edwards (01625)	1		
Billing					
217	12/21/09	Contract for Services between Searcy Denny Scarola Barnhart & Shipley and Bradley J. Edwards	2		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
218	N/D	Spreadsheet of Brad Edwards' Time in <i>Edwards v. adv. Epstein</i> (BJE000000104 – BJE000000156)	0		
219	7/14/10 – 1/16/13	Searcy Denney Scarola Barnhart and Shipley's Invoices for Disbursements to Bradley J. Edwards (BJE000000039 – BJE000000103)	2		
220	1/1/80 – 2/15/13	Searcy Denney Scarola Barnhart and Shipley's Matter Ledger Report (BJE000000006 – BJE000000038)	2		
Miscellaneous					
221	10/23/09	Rothstein Rosenfeldt Adler's Firm Directory	3, 7, 8		
222	11/9/17	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s "Our Attorneys" website printout (https://www.pathtojustice.com/about-us/attorneys/)	3, 4, 7, 8		
223	12/1/09	Criminal Complaint; <i>United States of America v. Alfredo Rodriguez</i> ; USDC S.D. Fla. Case No. 098308	3, 4, 7, 8		
224	4/23/10	Affidavit of Bradley James Edwards	0		
225	9/21/10	Affidavit of Bradley James Edwards	0		
226	Misc.	Subpoenas and Notices of Deposition for Alan Dershowitz, David Copperfield and Leonard Baird	3, 4, 7, 8		
227	11/16/17	Critton Luttier Coleman, LLP's website printout for Robert D. Critton Jr. (https://www.lawclc.com/team_members/Robert-d-critton-jr/)	3, 4, 7, 8		
228	11/16/17	Fowler White Burnett, P.A.'s website printout for Joseph L. Ackerman, Jr. (http://www.fowler-white.com/Attorneys/id/3/read)	3, 4, 7, 8		
Bradley J. Edwards					
229	N/D	The National Crime Victim Bar Association presentation excerpt of article by Bradley J. Edwards: <i>Who is Responsible for Child Sexual Abuse</i>	3, 4, 8		
230	N/D	The Florida Bar's website member profile printout for Bradley James Edwards	7, 8		
231	N/D	National Association of Distinguished Counsel biographical information for Bradley J. Edwards	7, 8		
232	5/14/13	The National Trial Lawyers Top 40 Under 40 Directory (http://www.thenationaltriallawyers.org/top-40-under-40-directory/?last_name=Edwards&city=&state=FL&)	7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
233	5/14/13	The National Trial Lawyers Profile View of Brad Edwards. (http://www.thenationaltriallawyers.org/profile-view/Brad/Edwards/4409/)	7, 8		
234	5/14/13	Lawyers.com website information for Bradley J. Edwards (http://www.lawyers.com/florida/fort-lauderdale/Bradley-J-Edwards-3489098-a/)	7, 8		
235	10/30/04	Kubicki Draper's website attorney information for Brad J. Edwards	3, 7, 8		
236	10/30/05	Kubicki Draper's website attorney information for Brad J. Edwards	3, 7, 8		
237		The American Registry Website printouts of recognitions received by Bradley J. Edwards	7, 8		
238	5/7/12	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout. (http://www.abuseandassault.com/Abuse_Under_Investigation)	7, 8		
239	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Investigation)	7, 8		
240	1/16/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/press-releases/)	7, 8		
241	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. website printout (http://www.abuseandassault.com/Abuse	7, 8		
242	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.abuseandassault.com/Abuse_Under_Notable_Cases)	7, 8		
243	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards (www.pathtojustice.com/attorneys/brad-	7, 8		
244	5/14/13	Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website printout (http://www.pathtojustice.com/media-center/achived-press-	7, 8		
245		Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.'s website attorney information for Brad Edwards with referenced articles	7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
A.	Winter 2014	Journal of Criminal Law and Criminology. Volume 104; Issue 1. <i>Crime Victims' Rights During Criminal Investigations? Applying the Crime Victims' Rights Act Before Criminal Charges are Filed;</i>	3, 7, 8		
B.	12/26/15	Politico. <i>Victims in Underage Sex Case Want Prosecutors to Testify</i>	3, 4, 7, 8		
C.	12/21/15	Palm Beach Daily News. <i>Jeffrey Epstein Sex Scandal: Alan Dershowitz Suffers Setback in Defamation Case</i>	3, 4, 7, 8		
D.	12/18/15	Palm Beach Daily News. <i>Epstein Victims' Attorneys Seek Partial Victory in Defamation Suit</i>	3, 4, 7, 8		
E.	12/21/15	Palm Beach Post. <i>Boca-Resident Model Nabs \$13.4 Million Following Six-Year Divorce Battle</i>	3, 4, 7, 8		
F.	12/17/15	Daily Mail.Com. <i>Florida Model Gets Whopping \$13.4 Million Payout from Real Estate Tycoon Ex-Husband After Nasty Six-Year Divorce Battle</i>	3, 4, 7, 8		
G.	11/25/15	Palm Beach Daily News. <i>Appellate Court Reverses Palm Beach Sex Offender Jeffrey Epstein's Victory</i>	3, 4, 7, 8		
H.	11/12/15	Daily Business Review. <i>Attorney's Suit Against Billionaire Allowed as Long as Justices Say It's OK</i>	3, 4, 7, 8		
I.	7/8/15	Palm Beach Daily News. <i>Judge Keeps Thousands of Epstein Documents Sealed</i>	0		
J.	6/25/15	WCVB5. <i>Jury Awards \$24 Million to Mass. Widower in Fatal Cabana Crash</i>	3, 4, 7, 8		
K.	6/24/15	NBC6. <i>Jury Awards 24 Million in Fatal Cabana Crash</i>	3, 4, 7, 8		
L.	6/24/15	CBS Miami. <i>Jury Awards Millions to Husband of Pregnant Woman Killed by Drunk Driver</i>	3, 4, 7, 8		
M.	6/25/15	Sun Sentinel. <i>Jury Awards \$24 Million to Widower in Fatal Cabana Crash</i>	3, 4, 7, 8		
N.	1/8/15	Daily Business Review. <i>The Lawyer Suing Legal Legend Alan Dershowitz Over Sex Offender</i>	3, 4, 7, 8		
O.	4/21/14	The Washington Post. <i>Eleventh Circuit Rules that Discovery Can Move Forward on My Crime Victims' Rights Act Case</i>	3, 4, 7, 8		
P.	4/21/14	Palm Beach Daily News. <i>Appeals Court Rules Against Sex Offender. Attorneys for Underage Victims Seek to Overturn "Sweetheart Plea"</i>	3, 4, 7, 8		
Q.	4/21/14	Sun-Sentinel. <i>Victims Win Right to See Negotiation that Led to 'Lenient' Plea Deal Agreement for Billionaire Sex Offender</i>	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
R.	4/21/14	Palm Beach Post. <i>Appellate Ruling Could Force Feds to Reconsider Sex. Changes Against Palm Beacher Epstein</i>	3, 4, 7, 8		
S.	10/20/13	Palm Beach Daily News. <i>Newest Lawsuit Against Epstein Expected to Include Victim Testimony</i>	0		
T.	9/10/12	CBS Miami, <i>Exclusive: Sexual Assault Victim Alleges Abuse by Former Youth Pastor</i>	3, 4, 7, 8		
U.	9/7/12	Sun-Sentinel. <i>Elevator Fall Nets Woman \$13 Million Jury Award</i>	3, 4, 7, 8		
V.	July 2012	Daily Business Review. <i>Top Florida Verdicts & Settlements of 2011</i>	3, 4, 7, 8		
W.	6/13/12	Daily Business Review. <i>Suit Accuses Goldrush Strip Club of Scheme to Bilk Professionals</i>	3, 4, 7, 8		
X.	4/22/11	Palm Beach Daily Business Review. <i>Jeffrey Epstein Amends Lawsuit; Claims Victims' Attorney Threatened to Depose His Friends</i>	3, 4, 7, 8		
246	8/10/16	Farmer Jaffe Weissing's Facebook page with referenced articles	3, 4, 7, 8		
A.	5/22/16	Lawnewz.com. <i>The Shameful Way Feds Protected Convicted Pedophile Billionaire Jeffrey Epstein</i>	0		
B.	5/13/16	Fox News. <i>Flight Logs Show Bill Clinton Flew on Sex Offender's Jet Much More than Previously Known</i>	0		
C.	2/11/16	Sun-Sentinel. <i>Feds Deceived Us About Billionaire Sex Offender's 'Sweetheart Deal' Teen Victims Say</i>	0		
D.	2/12/16	NBC News. <i>Lawyers: Victims Not Told of 'Sweetheart Deal' for Jeffrey Epstein</i>	0		
E.	2/11/16	NY Daily News. <i>Jeffrey Epstein Accusers Sue Feds Over Hidden Non-Prosecution 'Conspiracy'</i>	0		
F.	4/23/14	Farmer, Jaffe. <i>Appeals Court Rules in Favor of Crime Victims' Rights in Registered Pedophile Jeffrey E. Epstein Case</i>	3, 4, 7, 8		
G.	4/23/14	Daily Business Review. <i>Prosecutors Must Turn Over Docs in Billionaire Sex Offender Jeffrey Epstein Case</i>	0		
247	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Court, Case No. 16-1995-MM-000074-AXXA-MA	1		
248	Misc.	Court and arrest information; <i>Bradley James Edwards</i> ; Duval County Case No. 16-1998-CF-004394-AXXX-MA	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
249	8/14/07	Exemption and/or Limitation Exclusion – Tax Assessment of \$3,507.72	1		
250	1/7/08	Notice of Satisfaction of Lien Relative to Tax Exemption	1		
251	Misc.	Docket and all court filings referenced therein; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
252	1/21/10	Petition/Complaint; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
253	2/18/10	Bradley J. Edwards' Answer and Affirmative Defenses; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
254	8/11/10	Notice of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
255	8/11/10	Final Summary Judgment of Mortgage Foreclosure; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA002613AXXXCE	1		
256	10/22/10	Certificate of Sale; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
257	11/2/10	Certificate of Title; <i>U.S. Bank National Association v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No.	1		
258	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
259	3/17/10	Petition/Complaint; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
260	10/4/11	Final Summary Judgment of Mortgage Foreclosure; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
261	10/10/11	Notice of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
262	1/5/12	Certificate of Sale; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
263	1/18/12	Certificate of Title; <i>Wells Fargo Bank, N.A. v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2010CA012467AXXXCE	1		
264	Misc.	Docket and all court filings referenced therein; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-	1		
265	12/8/11	Complaint; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427	1		
266	1/25/12	Stipulation for Settlement; <i>1st United Bank v. Bradley J. Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 11-030427	1		
267	Misc.	Docket and all court filings referenced therein; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
268	3/22/12	Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
269	5/18/12	Bradley J. Edwards' Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
270	10/3/12	Order Denying Motion to Dismiss; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
271	10/26/12	Answer to Complaint; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
272	11/20/12	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
273	3/15/13	Mediation Report; <i>Wells Fargo Bank, N.A. v. Bradley Edwards</i> ; 17 th Judicial Circuit, Broward County Case No. 2012CC003827AXXXWE	1		
274		Corporate Detail Printout from Sunbiz.org for The Law Office of Brad Edwards & Associates, LLC	1		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
275	4/16/07	Articles of Organization for Florida Limited Liability Company for The Law Office of Brad Edwards & Associates, LLC	1		
276	1/25/08	2008 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates	1		
277	3/11/09	2009 Limited Liability Company Annual Report for The Law Office of Brad Edwards and Associates	1		
278		Florida Bar Rules including, but not limited to, Florida Bar Rule 4-7.21	1		
279	3/3/08	Complaint; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 1)	1		
280	6/17/08	Omnibus Order on Defendants' Motion to Dismiss; <i>Donald D. Baker v. The City of Hollywood, et al.</i> ; Case No. 08-60294-CIV-HUCK (D.E. 79)	1		
281	8/10/10	U.S. Court of Appeals Opinion; <i>Donald D. Baker v. City of Hollywood, et al.</i> ; Case No. 08-14924 & 08-15602	1		
282	12/9/04	New Times Broward Palm-Beach: <i>Tale of the Tape</i>	1		
Experts					
283	10/20/17	Dr. Bernard J. Jansen's Expert Report with attachments	0		
284	Misc.	All documents produced, or relied upon or referenced by Dr. Bernard J. Jansen in preparing his 10/20/17 Report	0		
285	9/9/16	Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)	1		
286	11/30/16	Supplemental Expert Witness Report of Dr. Bernard J. Jansen in <i>Virginia Giuffre v. Ghislaine Maxwell</i> (USDC NY)	1		
287	Misc.	All public records, news articles and prior testimony of Dr. Bernard J. Jansen	1		
Other Articles					
288	11/1/09	<i>Kendall Coffey: Law Firm Victimized by Scott Rothstein</i>	3, 4, 7, 8		
289	11/2/09	<i>Legal Junkies. WSJ Law Blog – Rothstein Rosenfeldt Adler, Ft. Lauderdale, Law Firm Dissolution, Ponzi Scheme</i>	3, 4, 7, 8		
290	11/2/09	<i>New Times Broward-Palm Beach. Chief Judge: Scott Rothstein's Firm Has "No Money" and is Going into Receivership</i>	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
291	11/3/09	The New York Times: <i>Fraud Accusations Against Florida Lawyer Set Off a Race to Return His Donations</i>	3, 4, 7, 8		
292	11/3/09	Rothstein Returns After Contemplating Suicide, Partner Says	3, 4, 7, 8		
293	11/3/09	Florida Law Firm Asks to be Dissolved	3, 4, 7, 8		
294	11/3/09	Sun Sentinel. Scott Rothstein's Investment Deals Seemed Too Good to be True	3, 4, 7, 8		
295	11/5/09	Funds News. FBI Agents Search Law Firm in Missing Funds Probe	3, 4, 7, 8		
296	11/6/09	New Times Broward-Palm Beach. Scott Rothstein: The Jeffrey Epstein and Bill Clinton Ploy	3, 4, 7, 8		
297	11/6/09	Rothstein Accomplice Still on Lam	3, 4, 7, 8		
298	11/7/09	Tour of Scott Rothstein's Office Reveals Gallery of Who's Who	3, 4, 7, 8		
299	11/12/09	Sun Sentinel: FBI Doubts Rothstein Ran a Ponzi Scheme Alone	3, 4, 7, 8		
300	11/13/09	Palm Beach Post: FBI Doubts Rothstein's Scheme a 'One-Man Show'	3, 4, 7, 8		
301	11/13/09	Sun Sentinel. High-Ranking Police Officers Guarded Over Rothstein	3, 4, 7, 8		
302	11/17/09	Inside the Rothstein Swindle, Part I	3, 4, 7, 8		
303	11/17/09	Sun Sentinel. Rothstein Asks to Voluntarily Give Up Law License	3, 4, 7, 8		
304	11/17/09	Rothstein and Dreier: How Much Alike?	3, 4, 7, 8		
305	11/18/09	Inside the Rothstein Swindle, Part II	3, 4, 7, 8		
306	11/18/09	Former RAA Attorneys Take New Jobs	3, 4, 7, 8		
307	11/20/09	Scherer Files Suit Against Rothstein, et al.	3, 4, 7, 8		
308	11/20/09	Article by Paul Brinkman	3, 4, 7, 8		
309	11/21/09	Rothstein Feeder George Levin's Ugly Past	3, 4, 7, 8		
310	11/22/09	George Levin was Rothstein's Whale	3, 4, 7, 8		
311	11/23/09	Rothstein Associate Levy Got Protection from Plantation Cops	3, 4, 7, 8		
312	11/23/09	Main Line Firm's Clients Invested \$30 Million with 'Ponzi' Lawyer	3, 4, 7, 8		
313	11/23/09	Sun-Sentinel. Scott Rothstein: "You're in Town Full of Thieves"	3, 4, 7, 8		
314	11/24/09	Miami Herald. Feds: Scott Rothstein Ponzi Scheme Paid Salaries at Law Firm	3, 4, 7, 8		
315	11/26/09	The Rothstein Wires	3, 4, 7, 8		
316	1/13/10	Sun Sentinel. Florida Bar Looking at 35 Former Attorneys from Rothstein's Firm	3, 4, 7, 8		

No.	Date	Description	Objection	Marked in Evidence	Marked for Id.
317	July 2010	Sun Sentinel. <i>22 Former Scott Rothstein Attorneys Cleared by the Florida Bar</i>	3, 4, 7, 8		
318	10/22/10	South Florida Business Journal. <i>A Year After Rothstein, Many Questions Unanswered</i>	3, 4, 7, 8		
319	10/31/10	The Florida Bar. <i>Scott Rothstein Scandal: One Year Later</i>	3, 4, 7, 8		
320	1/21/13	Forbes. <i>Rothstein Expose Details Sex, Murder, and Corruption Behind Florida's Largest Ponzi Scheme</i>	3, 4, 7, 8		
321	10/13/14	<i>Five Years on, Rothstein's Ponzi Still Resonates</i>	3, 4, 7, 8		
322	10/3/17	Palm Beach Daily News. <i>Epstein Paid Three Women \$5.5 Million to End Underage Sex Lawsuits</i>	0		
General					
323		All public records and news articles relating to Scott Rothstein, Rothstein Rosenfeldt Adler, Bradley J. Edwards and any witnesses listed by either party	1		
324		All court dockets and filings in all matters against Jeffrey Epstein relating to any victim's claims	1		
325		All prior testimony, statements, reports and affidavits of any witness or experts	1		
326		All charts/analyses prepared based on documents exchanged or later discovered	1		
327		All foundation exhibits	1		
328		All rebuttal and impeachment exhibits	1		
329		Demonstrative aids and exhibits including, but not limited to, charts, timelines, diagrams, models, surveys, photographs and blow-ups	1		
330		All newly discovered documents/exhibits	1		
331		Any and all exhibits listed by Bradley J. Edwards (by identifying these as exhibits, Plaintiff is not waiving his right to object to any of Edwards' exhibits introduced at trial)	1		

Plaintiff/Counter-Defendant reserves his right to supplement this Exhibit List.

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 12th day of December, 2017.



Jack Scarola

Florida Bar No.: 169440

David P. Vitale Jr.

Florida Bar No.: 115179

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Primary E-Mail: _scarolateam@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

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EXHIBIT C

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

**SEVENTH AMENDED AND SUPPLEMENTAL WITNESS LIST
OF COUNTER-PLAINTIFF BRADLEY J. EDWARDS**

Counter-Plaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys,
hereby supplements his list of witnesses for trial as follows:

WITNESSES EXPECTED TO BE PRESENTED

1. Bradley J. Edwards
2. Jeffrey Epstein
3. Sarah Vickers (formerly Kellen)
c/o John Stephenson
1201 W. Peachtree Street
Atlanta, Georgia 30339
4. Nadia Marcinkova
c/o Erica Dubno
767 Third Avenue, Suite 3600
New York, New York 10017
5. Virginia Roberts Guiffre
c/o Stan Pottinger
49 Twin Lakes Road, Suite 100
South Salem NY 10590

6. Maria Farmer
c/o Peter Guirguis, Esq.
Mintz & Gold LLP
600 Third Avenue, 25th Floor,
New York 10016
7. Annie Farmer
c/o Peter Guirguis, Esq.
Mintz & Gold LLP
600 Third Avenue, 25th Floor,
New York, 10016
8. Nadia Bjorlin
13701 Riverside Drive, Suite 800
Sherman Oaks, CA 91423-2449
9. Alexandra Hall
c/o Robert C. Josefsberg, Esq.
Podhurst Orseck, PA
One S.E. 3rd Avenue, Suite 2700
Miami, FL 33131
10. Robert C. Josefsberg, Esquire
Podhurst Orseck, PA
One S.E. 3rd Avenue, Suite 2700
Miami, FL 33131
11. Detective Joseph Recarey
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
12. Chief Michael Reiter
Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
13. John Connolly
c/o Simon & Schuster
1230 6th Avenue
New York, New York 10020

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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 3 of 22

14. Charles Lichtman, Esquire
Berger Singerman
300 East Las Olas Boulevard, Suite 1000.
Fort Lauderdale, FL 33301
15. Courtney Wild
c/o Adam Horowitz.
Horowitz Law
425 North Andrews Avenue, Suite 2
Fort Lauderdale FL 33301.
16. Antonio Figueroa (Tony)
Palm Coast, Florida
17. Records Custodian of Palm Beach Police Department
345 South County Road
Palm Beach, FL 33480
18. Records Custodian of United States Attorney's Office
for the Southern District of Florida
19. Records Custodian of the Federal Bureau of Investigations
20. Spencer Kuvin, Esquire
1800 S. Australian Avenue, #400
West Palm Beach, Florida 33409
21. Theodore Leopold, Esquire
Cohen Milstein
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, Florida 33410
22. Rinaldo Rizzo
c/o Robert Lewis
228 East 45th Street | 17th Floor
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23. Adam Horowitz, Esquire
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EDWARDS ADV. EPSTEIN;

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 4 of 22

24. Isidro M. Garcia, Esquire
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26. Bernard J. Jansen, Ph.D.
c/o Jack Scarola
Searcy Denney Scarola Barnhart & Shipley
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27. William Berger, Esquire
Weiss, Handler, Cornwell, P.A.
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Boca Raton, FL 33431

WITNESSES WHICH MAY BE CALLED IF THE NEED ARISES

28. Adriana Mucinska
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Miami Beach, FL 33141
29. Landon Thomas
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620 Eighth Avenue
New York, NY 10018
30. Oren Kramer
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31. Lawrence LaVecchio
United States Attorney's Office, Southern District of Florida
Broward Financial Center
Fort Lauderdale, Florida

EDWARDS ADV. EPSTEIN

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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 5 of 22

32. Amanda Laszlo
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34. Anouska DeGeorgiou
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35. Angelique Garcia
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36. Carolyn Andriamo
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Searcy Denney Scarola Barnhart & Shipley
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37. Ashley Davis
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38. Brandy Brenson
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39. Molly Smythe
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40. Courtney Langley
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41. William Scherer, Esquire
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42. Paul Cassell, Esq.
383 S. University Street
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43. Faith Pentek
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44. Teala Davies
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45. Felicia Esposito Cartwright
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46. Jennifer Amenold
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47. Jennifer Pitts Catino
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EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 7 of 22

48. Prince Andrew Albert Christian Edwards
Duke of York, Buckingham Palace Road
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49. Frederic Fekkai
Address Currently Unknown
50. Kara Henderson
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51. Lesley Groff
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52. Dave Rogers
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EDWARDS ADV, EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 8 of 22

56. Michelle Licata
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60. Sabrina Ewart
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61. Saige Gonzales
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62. Johanna Sjoberg
c/o Marshall Dore Louis
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63. Jason Richards
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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 9 of 22

64. Shawna Rivera
c/o Bradley Edwards, Esq..
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65. Tatum Miller
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67. Virginia Alvarez
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70. Daynia Nida
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West Palm Beach, FL, 33401

EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 10 of 22

71. Igor Zinoviev
Address Currently Unknown
72. Pralaya Cuomo
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73. Svetlana Pozhidaeva
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74. Seth Lehrman
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75. Matt Weissing
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76. Maria Villafana
500 S. Australian Avenue, #400
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77. Any additional individuals identified as victims by the United States Attorney's
Office and whose identities were conveyed to Jeffrey Epstein as part of a list
supplied as it related to the NPA.
78. Leslie Wexner
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79. President Donald J. Trump
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80. Larry Visoski
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81. Maritza Vasquez
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82. Maximilia Cordero
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87. Haley Robson
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88. Michael Fisten
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89. Russell Adler
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90. Marie Alessi
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91. Janusz Banasiak
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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 12 of 22.

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95. Jerry Goldsmith
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100. Glenn Dubin
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101. Abigail Wexner
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102. Officer Munyan
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Palm Beach, FL 33480.

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111. Cecilia Steen
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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 14 of 22

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115. Todd Meister
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117. William Hammond
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118. Robert Roxburgh
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119. Michele Pagan
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120. Michele Dawson
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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

Page 15 of 22

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128. Zack Bryan
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129. Zinta Braukis
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130. Larry Morrison
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131. Story Cowles
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132. Michael Dawson
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345 South County Road
Palm Beach, FL 33480

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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

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139. Steven Hoffenberg
Address Currently Unknown
140. Michael Stroll
Address Currently Unknown
141. Douglas Shoettle
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143. Amazon Records Custodian
144. Yellow Cab Records Custodian

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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

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145. Citrix Systems, Inc. Records Custodian
146. Federal Bureau of Investigation Records Custodian
147. Milton Girls Juvenile Facility Records Custodian
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Milton, FL
148. School District of Palm Beach County Records Custodian
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149. St. Mary's Medical Center Records Custodian
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150. Wellington Reginal Hospital Records Custodian
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Wellington, FL 33414
151. All witnesses that Defendants have listed on their Witness List not objected to by Plaintiff.
152. All rebuttal witnesses.
153. All People on Jeffrey Epstein's Inmate Visitor Log while he was in jail.

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BY MEANS OF DEPOSITION

154. Mark Epstein
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158. Scott Rothstein
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159. Jeffrey Epstein

160. Courtney Wild
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c/o Jack Scarola
Searcy Denney Scarola Barnhart & Shipley
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The following witnesses are attorneys that are not retained or specially employed to provide expert testimony, but may provide opinions relating to the propriety of Brad Edward's conduct of discovery in the prosecution of the Epstein claims.

162. Robert C. Josefsberg, Esquire
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Seventh Amended and Supplemental Witness List of Counter-Plaintiff Bradley J. Edwards

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Plaintiff reserves the right to amend this list.

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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 9th day of November, 2017.



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EDWARDS ADV. EPSTEIN

Case No.: 502009CA040800XXXXMBAG

Seventh Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

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EDWARDS ADV. EPSTEIN.

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Seventh Amended and Supplemental Witness List of Counterplaintiff Bradley J. Edwards

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EXHIBIT D

NOT A CERTIFIED COPY

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

Case No. 50-2009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

v.

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

Defendants/Counter-Plaintiff.

PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN'S
AMENDED TRIAL WITNESS LIST

Plaintiff/Counter-Defendant Jeffrey Epstein, files this Amended Trial Witness List as follows:

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58. Any and all witnesses listed by Bradley J. Edwards, depending on their testimony
in Edwards' case in chief.

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67. Any and all witnesses whose names appear in depositions, interrogatories or documents produced in response to requests for production provided by Bradley J. Edwards depending on the testimony in Edwards' case in chief.

EXPERT WITNESS

68. D. Culver (Skip) Smith III
Culver Smith III, P.A.
500 South Australian Avenue, Suite 600
West Palm Beach, FL 33401
Telephone: 598-6800

Subject Matter: Mr. Smith will testify as to legal ethics and responsibility, probable cause and professional reputation.

Substance of the Facts and Opinions: The pleadings and information that was available before the original civil proceeding was initiated and discovered during the pendency of the original civil proceeding and deposition testimony.

Summary of Grounds for Each Opinion: Mr. Smith has not reached his final opinions.

Curricula Vitae: A copy of Mr. Smith's Curricula Vitae is attached as **Exhibit A**.

Epstein reserves the right to list and/or call any and all newly discovered witnesses upon proper notice and to call and/or produce any and all additional witnesses necessary for impeachment or rebuttal. Epstein reserves the right to amend and/or supplement this Witness List upon proper notice to the parties and the Court.

CERTIFICATE OF SERVICE

I certify that the foregoing document has been furnished to the attorneys listed on the Service List below on December 15, 2017, through the Court's e-filing portal pursuant to Florida Rule of Judicial Administration 2.516(b)(1).

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By: /s/ Scott J. Link

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