

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

CIVIL DIVISION AG  
CASE NO. 502009CA040800XXXXMB  
Judge David F. Crow

JEFFREY EPSTEIN,

Plaintiff,

v.

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

Defendants.

**PLAINTIFF/COUNTER-DEFENDANT JEFFREY EPSTEIN  
MOTION FOR LEAVE TO EXCEED PAGE LIMIT IN RESPONSE TO  
EDWARDS' MOTION FOR LEAVE TO AMEND TO ADD PUNITIVE DAMAGES**

COMES NOW the Plaintiff/Counter-Defendant, Jeffrey Epstein ("Epstein") and respectfully moves this Court for an Order allowing the undersigned counsel leave to exceed the 10 pages limit in the Response in Opposition to Defendant/Counter-Plaintiff Bradley Edwards' ("Edwards") Motion for Leave to Amend to Assert a Claim for Punitive Damages and Supplement Thereto, and as grounds therefore states as follows:

1. On July 18, 2011, Edwards filed a Motion for Leave to Amend to Assert a Claim for Punitive Damages which is 27 pages long.
2. On July 29, 2011, Edwards filed a Supplement to his Proffer in Support of Motion for Leave to Amend to Assert a Claim for Punitive Damages which is 1 page with a 5-page exhibit.
3. On August 29, 2011, Edwards filed another Supplement to his Motion to Dismiss and Motion for Leave to Amend to Assert a Claim for Punitive Damages which is 1½ pages long.

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4. The total number of pages relating to Edwards' Motion for Leave to Amend to Add Punitive Damages is 29 to 30 pages.

5. This Court's Administrative Rule sets a limit of 10 pages for Motions and Responses: "Any Memorandums submitted are limited to 10 double-spaced pages."

6. Epstein has made every effort to prepare a Response in Opposition to the Motion for Punitive Damages that is 10 pages or less. However, given the length of the Motion and the number of issues that need a response, the best that Epstein can do is respond in approximately 18 pages of text.

7. Epstein requests leave to file a Response in excess of the Court's 10 double-spaced pages limit.

8. There is no prejudice to Edwards, particularly since his Motion and supplements thereto are well in excess of the Court's page limit.

9. Undersigned certifies this Motion is made in good faith and not for the purpose of delay.

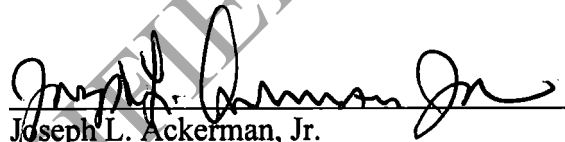
10. Undersigned certifies that an attempt has been made and will continue to be made to resolve this issue without the need of a hearing.

WHEREFORE, Plaintiff/Counter-Defendant Jeffrey Epstein respectfully requests that this Court enter an Order granting his Motion for Leave to Exceed Page Limit in Response to Edwards' Motion for Leave to Amend to Add Punitive Damages for the reasons set forth above, or alternatively require Defendant/Counter-Plaintiff Edwards to re-file his Motion within the Court's page limit.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via e-mail and U.S. Mail on this 21<sup>st</sup> day of September, 2011 to: Jack Scarola, Esq., Searcy Denney Scarola Barnhart & Shipley, P.A., 2139 Palm Beach Lakes Boulevard, West Palm Beach, FL 33409; Jack Alan Goldberger, Esq., Atterbury, Goldberger & Weiss, P.A., 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401-5012; and Marc S. Nurik, Esq., Law Offices of Marc S. Nurik, One East Broward Boulevard, Suite 700, Fort Lauderdale, FL 33301.

Respectfully submitted,



Joseph L. Ackerman, Jr.  
Florida Bar No. 235954

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