

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,

EXHIBIT LIST OF DEFENDANT/COUNTERPLAINTIFF, BRADLEY EDWARDS

COMES NOW the Defendant/Counterplaintiff, BRADLEY J. EDWARDS, by and through his undersigned attorneys and hereby lists his exhibits for trial as follows:

DEF. NO.	PLF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS
<u>EXHIBITS EXPECTED TO BE USED</u>					
1.					All applicable criminal statutes
2.					All applicable Florida Statutes
3.					All applicable Rules of Evidence
4.					Video of Defendant, Jeffrey Epstein's home and route from Plaintiff to Defendant's home
5.					Order confirmation from Amazon.com 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"
6.					Non-Prosecution Agreement
7.					Jane Doe 102 Complaint
8.					Messages taken from message pads found at Defendant's home
9.					Documents related to Jeffrey Epstein produced by Alfredo Rodriguez
10.					Jeffrey Epstein flight logs
11.					Jeffrey Epstein phone records
12.					Sarah Kellen's phone records

PALM BEACH CIRCUIT COURT
CIVIL DIVISION

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	13.				Jail Visitation Logs
	14.				Jeffrey Epstein's probation file
	15.				All probable cause affidavits related to criminal investigation of Jeffrey Epstein
	16.				All evidence, information and documents taken or possessed by FBI related to criminal investigation of Jeffrey Epstein
	17.				Plaintiffs and other victims' statements to the FBI related to criminal investigation of Jeffrey Epstein
	18.				Video of Search Warrant of Jeffrey Epstein's home being executed
	19.				Application for Search Warrant of Jeffrey Epstein's home
	20.				Complaint Jane Doe v. Epstein and all subsequent Amended Complaints
	21.				All records of homes, properties, bank accounts and any and all records related to Jeffrey Epstein's assets
	22.				Jeffrey Epstein's passport (or copy)
	23.				Jeffrey Epstein's driver's license (or copy)
	24.				List of corporations owned by Jeffrey Epstein
	25.				All documents evidencing relationship between Jeffrey Epstein and Jean Luc Brunel
	26.				All documents evidencing relationship between Jeffrey Epstein and MC2 or any modeling agencies
	27.				Yearbooks of plaintiff, Jane Doe
	28.				2002 Royal Palm Beach High School Year Book
	29.				2001 Royal Palm Beach High School Year Book
	30.				2003 Palm Beach Gardens High School Year Book
	31.				Affidavit and Application for Search Warrant on Jeffrey Epstein's home
	32.				Tape recording or transcript of recording of conversation between Jeffrey Epstein and George Rush
	33.				Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation
	34.				The Palm Beach State Attorney's Criminal file against Jeffrey Epstein
	35.				All documents related to Jeffrey Epstein's 6/30/08 conviction
	36.				Jeffrey Epstein's criminal plea colloquy
	37.				Public records from the Department of Corrections related to Jeffrey Epstein

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	38.				Records from the Florida Department of Law Enforcement related to Jeffrey Epstein
	39.				All statements made by Jeffrey Epstein
	40.				List of properties and vehicles in Larry Visoski's name
	41.				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
	42.				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
	43.				Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him
	44.				All Complaints in which Jeffrey Epstein was a plaintiff or defendant
	45.				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
	46.				Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB
	47.				Jeffrey Epstein Deposition Testimony and discovery responses in State Court case Jeffrey Epstein v. Scott Rothstein, et al. Case No. 502009CA040800XXXXMBAG
	48.				Any and all newspaper articles, online articles or publications related to Jeffrey Epstein
	49.				Report and Analysis of Jeffrey Epstein's assets
	50.				Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.
	51.				Photos of all of Jeffrey Epstein's properties, cars, boats and planes
	52.				Probable Cause Affidavits prepared against Jeffrey Epstein and Sarah Kellen
	53.				Audio tape of Haley Robson
	54.				Photographs, videos and books taken in the search warrant of Jeffrey Epstein's home
	55.				Documents related to or evidencing Jeffrey Epstein's donations to law enforcement
	56.				Victim Notification Letter from US Attorney's Office to Plaintiff

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	57.				Expert Dr. L. Dennison Reed's Report of Plaintiff
	58.				Palm Beach Police Department Incident Report dated 4/20/06
	59.				All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein
	60.				All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein
	61.				Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs
	62.				Passenger lists for flights taken by Jeffrey Epstein
	63.				Letter from Jeffrey Epstein to Alberto Pinto regarding house island project
	64.				Jeffrey Epstein's bank statements
					Jeffrey Epstein's tax returns
	65.				MC2 emails involving communications of Jeffrey Epstein, Jeff Fuller, Maritza Vasquez, Pappas Suat, Jean Luc Brunel and Amanda Grant
	66.				DVD of plea and colloquy taken on 6-30-08
	67.				Transcript of plea and colloquy taken on 6-30-08
	68.				Massage Table
	69.				Lotions taken from Jeffrey Epstein's home during search warrant
	70.				Computers taken from Jeffrey Epstein's home during search warrant
	71.				Vibrators, dildos and other sex toys taken from Jeffrey Epstein's home during search warrant
	72.				No Contact Orders entered against Jeffrey Epstein
	73.				Criminal Score Sheet regarding Jeffrey Epstein
	74.				Documents evidencing Jeffrey Epstein's Community Control and Probation
	75.				Jeffrey Epstein's Sex Offender Registration
	76.				Jeffrey Epstein's Booking photograph
	77.				CAD calls to 358 EL BRILLO WAY, PALM BEACH FL 33480
	78.				List of Jeffrey Epstein's House contacts
	79.				Documents related to Jeffrey Epstein's investments

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	80.				Letter from Chief Michael Reiter to Barry Krischler
	81.				List of planes owned by Jeffrey Epstein
	82.				Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06
	83.				Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06
	84.				Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06
	85.				Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06
	86.				Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06
	87.				Letter from Goldberger dated 6-22-06
	88.				All subpoenas issued to State Grand Jury
	89.				Documents related to the rental of a vehicle for Vanessa Zalis
	90.				Ted's Sheds Documents
	91.				Documents related to property searches of Jeffrey Epstein's properties
	92.				Arrest Warrant of Sarah Kellen
	93.				Police report regarding Alexandra Hall picking up money dated 11-28-04
	94.				List of Trilateral Commission Members of 2003
	95.				Alan Dershowitz Letter dated 4-19-06 and Statute 90.410
	96.				Guy Fronstin letter dated 4-17-06
	97.				Jeffrey Epstein Account Information
	98.				Jeffrey Epstein Criminal Closeout Sheet
	99.				Jeffrey Epstein Polygraph Test and Results
	100.				Plaintiff's GED testing information and results
	101.				JEGE, Inc. Passenger Manifest
	102.				Hyperion Air Passenger Manifest
	103.				Flight information for Dana Burns
	104.				Passenger List Palm Beach flights 2005

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	105.				Jeffrey Epstein notepad notes
	106.				Pleadings of Jane Doe 1 and 2 v. US case
	107.				Jeffrey Epstein 5 th Amendment Speech
	108.				Reiter letter to Krisher dated 5-1-06
	109.				Jail receipts of Jeffrey Epstein
	110.				Alexandra Hall Police Report dated 11-28-04
	111.				Compulsory Medial Examination of victim, CMA
	112.				Plaintiff's school records and transcripts
	113.				Victim Notification letter dated 7-9-08
	114.				Plaintiff's employment records from IHOP
	115.				Police report of Juan Alessi theft at Jeffrey Epstein's home
	116.				Plaintiff's Medical Records from Milton Girls Juvenile Facility
	117.				Plaintiff's Medical Records from Dr. Randee Speciale
	118.				Plaintiff's Medical Records from Wellington Regional Hospital
	119.				Plaintiff's Medical Records from St. Mary's Medical Center
	120.				Plaintiff's Medical Records from United Health
	121.				All surveillance conducted by law enforcement on Jeffrey Epstein's home
	122.				Emails received from Palm Beach Records related to Jeffrey Epstein
	123.				All items listed on the Palm Beach Police Property Report Lists
	124.				All items taken in the execution of the search warrant of Jeffrey Epstein's home: 358 EL BRILLO WAY, PALM BEACH FL 33480
	125.				All copies of convictions related to Jeffrey Epstein
	126.				Jeffrey Epstein criminal records
	127.				All documents produced by Palm Beach Police Department prior to the deposition of Detective Recarey
	128.				Photographs of all persons listed on Plaintiff's Witness List
	129.				Statements, deposition transcripts, videotaped depositions and transcripts taken in connection with this and all related cases and

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					exhibits thereto
130.					Any and all expert witness reports and/or records generated in preparation for this litigation by any party to this cause
131.					Curriculum vitae of any and all listed experts
132.					Curriculum vitae of Dr. Ryan Hall
133.					Any articles or publications of Dr. Ryan Hall
134.					Any articles or publications of Dr. Richard Hall
135.					Any articles or publications of Dr. L. Dennison Reed
136.					All items and documentation review by Dr. L. Dennison Reed
137.					Transcript and video (DVD) of IME of Plaintiff
138.					All exhibits to Dr. L. Dennison Reed's Deposition
139.					All exhibits to Dr. Richard Hall's Deposition
140.					All items and documents reviewed by Dr. Richard Hall
141.					All items and documents reviewed by Dr. Ryan Hall
142.					All exhibits listed on the Defendant's Exhibit List
143.					Demonstrative aids and exhibits including, but not limited to, anatomical charts, diagrams and models, surveys, photographs and similar material including blow-ups of the aforesaid items.
144.					Any and all mortality tables
145.					Plaintiffs reserve all objections to Defendant's Exhibits
146.					Plaintiffs reserve the right to supplement and/or amend this Exhibit List
147.					By listing an Exhibit, Plaintiff is not waiving their right to object to same at trial and does not waive their right to amend same.

Plaintiff reserves the right to amend this list.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to all counsel on the attached list, this 30th day of June, 2010.



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