

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

CIRCUIT CIVIL DIVISION AG
CASE NO. 502009CA040800XXXXMB

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE HAFELE

vs.

SCOTT ROTHSTEIN,
individually, BRADLEY EDWARDS,
individually,
Defendants/Counter-Plaintiffs.

MOTION FOR PERMISSION TO TAKE DEPOSITION

COMES NOW, the Plaintiff/Counter Defendant, JEFFERY EPSTEIN, by and through his undersigned counsel and makes this his Motion to Take the Deposition of COURTNEY ELIZABETH WILD, (now known as COURTNEY ELIZABETH MOODY), and as grounds would show:

1. Pursuant to Florida Rules of Civil Procedure, Rule 1.310 (a),

" The deposition of a person confined in prison may be taken only with leave of the Court and on such terms as the Court prescribes.".

2. Ms. Moody, who has been listed as a trial witness, is currently incarcerated in the Gadsden Correctional Facility. Her current release date is January 18, 2019.

3. The undersigned attorney has been in touch with officials at the Gadsden Correctional Facility and it is anticipated that the Superintendent/Warden will give permission to take the deposition of Ms. Moody at Gadsden's Correctional Facility.

WHEREFORE, Plaintiff/Counter Defendant requests that the Court grant leave to take the deposition of Courtney E. Moody following the guidelines and requirements of the Superintendent/Warden of Gadsden Correctional Facility..

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to all Parties on the attached Service List by Electronic Service and by E-Mail, this 29th day of August, 2017

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