

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,

**REPLY TO JEFFREY EPSTEIN'S RESPONSE TO BRADLEY EDWARDS' MOTION  
IN LIMINE TO STRIKE THE JUNE 30, 2017 AFFIDAVIT OF JEFFREY EPSTEIN AND  
TO EXCLUDE EVIDENCE AS TO WHICH DISCOVERY WAS WITHHELD UNDER  
CLAIMS OF PRIVILEGE**

Bradley J. Edwards, by and through his undersigned counsel, hereby files his Reply to Jeffrey Epstein's Response to Bradley Edwards' Motion in Limine to Strike the June 30, 2017 Affidavit of Jeffrey Epstein and to Exclude Evidence As to Which Discovery Was Withheld Under Claims of Privilege and states:

In response to Bradley Edwards' motion, Jeffrey Epstein contends that he "answered all of the questions actually germane to this lawsuit" [emphasis included by Epstein]. Response Pg. 2. "When asked in deposition why he filed suit and upon which facts he based this decision, Epstein answered Edwards' questioning; he did not invoke his rights as to the issues germane to this litigation; to wit: why he filed suit..." [emphasis included by Epstein]. Response Pg. 18. "Here, because the underlying—or potential—criminal investigation against Epstein is neither relevant

nor material to the current litigation, evidence relating to same would not be probative to the case.”

Response Pg. 19.

That is the foundation of Epstein’s argument quoted directly from his Response. These assertions are ABSOLUTELY FALSE, and we need not look beyond Epstein’s Response for clear record illustrations of this falsity. This is Epstein’s testimony quoted directly from his Response:

Q: Why are you suing L.M.?

A: L.M. is part of a conspiracy with...Bradley Edwards...creating fraudulent cases of a sexually charged nature...creating, fabricating malicious cases of a sexual nature, including cases with respect to me, specifically in order to fleece unsuspecting investors in South Florida out of millions of dollars. Epstein deposition, Pg. 13, lines 9-21

Q: Did Brad Edwards do anything that he shouldn’t have done that forms the basis of your lawsuit against him? \* \* \*

A: He has—he has gone to the media out of, I believe in an attempt to gin up these allegations. Id. at Pg. 19, line 7, Pg. 20, line 5

Q: What did these other people tell you Mr. Edwards did with respect to going to other media?

A: Mr. Edwards went to the media to gin up his cases in order that the Rothstein firm could generate profits, falsely taking in investors, creating false stories to the local medias [sic] and making statements to local press regarding false claims made by his clients in order that Scott

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Rothstein, who currently sits in jail, could defraud, along with his other partners of his firm, local Florida investors, Mr. Scarola, out of millions of dollars.

*Id.* at Pg. 28, line 13, Pg. 29, line 6

Q: What does “gin up” these allegations mean?

A: It means craft allegations...based on cases that didn't exist or alleged cases that I had settled.

*Id.* at Pg. 31

So, what is obviously “germane to this lawsuit” based on Epstein’s own explanation of the basis for his claims against Bradley Edwards is whether Mr. Edwards fabricated sexually charged claims against Epstein as part of Bradley Edwards’ knowing participation in a massive Ponzi scheme. Let us turn again to the testimony Epstein quotes in his own Response to determine the accuracy of Epstein’s central contention that he answered “all of the questions actually germane to this lawsuit.”

Q: Specifically, what are the allegations against you which you contend Mr. Edwards ginned up?

A: I would like to answer that question. A, many of the files and documents that we’ve requested from Mr. Edwards and the Rothstein firm are still unavailable. With respect to anything that I can point to today, I’m, unfortunately, going to have to take the Fifth Amendment on that, Sixth and 14th.

*Id.* at Pg. 33

Q: Well, which of Mr. Edwards’ cases do you contend were fabricated?

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A: Again, we've requested most of the..information from the bankruptcy trustee. We've been unable..Mr. Edwards has not given us the total file, but respect to any individual, I would have..at the moment I would have to assert my Fifth, Sixth and 14th Amendment clam, sir.

*Id.* at Pg. 38

Q: Do you have any personal knowledge that Bradley Edwards ever forged Federal Court Orders and/or Opinions?

A: It's attorney/client privilege.

Q: Do you have any personal knowledge that Bradley Edwards was ever involved in the marketing of non-existing Epstein settlements?

Mr. Pike: Same instruction.

The Witness: I'm sorry. I would like to answer that question, but on attorney/client privilege, I cannot today.

*Id.* at Pg. 48

Q: And I'm trying to find out, Mr. Epstein, whether you have any evidence whatsoever that Mr. Edwards ever personally participated in any of that wrongdoing?

The Witness: I'm afraid it will be attorney/client privilege, sir.

By Mr. Scarola:

Q: Do you have any evidence—knowledge of any evidence whatsoever that Mr. Edwards ever participated in any effort to market any kind of investment in anything?

A: I would have to claim attorney/client privilege on that, sir.

*Id.* at Pg. 67

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While numerous other examples of Epstein's highly relevant assertions of privilege have already been brought to the attention of the Court, we need not go outside the testimony cited in Epstein's own Response to see the absurdity of his assertion that his privilege assertions pertained to matters unrelated to the malicious prosecution claim pending against him. Indeed, it appears that Epstein's counsel failed to read the testimony they cited. Bradley Edwards' motion should be granted on the strength of Epstein's own responses.

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 20th day of October, 2017.



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