

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,

**BRADLEY J. EDWARDS' NOTICE OF FILING OBJECTIONS TO EPSTEIN'S
REVISED DESIGNATIONS FOR USE AT TRIAL OF THE DEPOSITION OF
BRADLEY J. EDWARDS TAKEN 5/15/13**

Defendant/Counterplaintiff, Bradley J. Edwards, by and through his undersigned counsel, re-asserts all objections on the record and objects to all colloquy between counsel, and hereby submits his Objections to Plaintiff/Counterdefendant, Jeffrey Epstein's Revised Designations to the deposition of Bradley J. Edwards taken on May 15, 2013 as follows:

OBJECTIONS¹

1. 5:15-11:3 (R)
2. 16:16-17:15 (CY)

¹ Code to Objections:

CY= Colloquy

R&M= Relevance & Materiality

SPEC= Speculation

P= Privilege

H= Hearsay

NP= No proper predicate

R= Repetitious

3. 21:8-24:1 (R&M)
4. 24:16-24:18 (CY)
5. 25:5-25:8 (CY)
6. 29:19-30:24 (CY, H)
7. 31:10-32:22 (P)
8. 35:1-36:8 (P, CY)
9. 38:23-40:3 (R&M, H)
10. 40:4-40:19 (R)
11. 40:20-40:25 (CY)
12. 46:1-46:7 (CY)
13. 48:24-49:6 (R&M)
14. 49:7-49:9 (R)
15. 49:10-51:5 (R&M)
16. 51:6-54:22 (R&M)
17. 54:23-55:9 (CY)
18. 57:5-57:12 (CY, R&M)
19. 58:20-58:21 (CY)
20. 59:10-60:15 (CY)
21. 60:16-60:19 (R)
22. 60:20-61:1 (R&M)
23. 61:17-70:23 (R&M)

Edwards adv. Epstein

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Edwards' Notice of Filing Objections to Epstein's Designations of Deposition of Edwards taken 5/15/13

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24. 71:16-72:10 (R&M)

25. 73:1-73:14 (R&M)

26. 75:14-87:2 (R&M)

27. 87:14-91:17 (R&M, P, CY)

28. 91:20-92:3 (CY)

29. 92:4-94:12 (CY)

30. 94:13-94:24 (R&M)

31. 94:25-95:8 (P)

32. 95:9-96:1 (CY)

33. 96:2-97:25 (R&M)

34. 98:1-102:2 (R&M)

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 October, 2013.



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