

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

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

Case No. 50 2009 CA 040800XXXXMBAG

vs.

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

Defendant/Counter-Plaintiff.

NOTICE OF E-FILING EXHIBITS

Plaintiff/Counter-Defendant Jeffrey Epstein, by and through his undersigned counsel and pursuant to Rule 2.516 of the *Florida Rules of Judicial Administration*, hereby files his exhibits to **Plaintiff/Counter-Defendant Jeffrey Epstein's Motion for Summary Judgment on Defendant/Counter-Plaintiff Bradley Edwards's Fourth Amended Counterclaim and Supporting Memorandum of Law** ("Motion"), previously filed and accepted by the Palm Beach County, Florida Civil Division Filing # **5846906**. The files accompanying this Notice of Filing Exhibits were previously filed on September 26, 2013 and again on October 2, 2013, but moved to Pending Queue due to procedural issues. This filing is an attempt to correct those procedural issues. The attachment hereto contains the exhibits to the above referenced Motion, which is not being re-filed contemporaneously herewith. However, the exhibits are being divided based upon the filing requirements of the rules of e-filing; each new exhibit begins when so marked on the is so marked on the bottom of the first page of said exhibit.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service (through the e-file portal), to all parties on the attached service list, this October 3, 2013.

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THE FLORIDA BAR

Daily News Summary

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Nov. 1, 2010

--Legal Profession--

ON HER TOES-- *Florida Trend*, <http://www.floridatrend.com>, Nov. 1, 2010.

Not only is Pamela C. Marsh the first woman to be appointed U.S. Attorney for Florida's Northern District, she's also the district's first U.S. Attorney who's a former ballerina. Marsh says she's honored that President Barack Obama picked her to lead the U.S. Attorney's Northern District office, but she says being a woman has less impact on her approach to her job than her ballet experience. Dancing professionally for ballet companies in Seattle and Fort Worth in the mid-1980s, she says, helped her become a more dogged prosecutor. Marsh manages the district's 36 assistant U.S. attorneys and helps them focus on the department's priorities, including healthcare fraud, drug trafficking and Internet crimes against children.

STAYING ATOP THE PILE-- *Pensacola News Journal/Pensacola Business Journal*, <http://www.pnj.com>, Oct. 31, 2010.

The mountain of lawsuits piling up as a result of the BP oil spill could become the largest and most expensive collection of tort damage cases in American legal history. Billions of dollars in damages are at stake as thousands of individuals and business owners sue BP, Transocean and Halliburton. Pensacola attorney Brian Barr is one of four lawyers chosen from a national pool by U.S. District Judge Carl Barbier to guide the damage suits — all consolidated in his court — to trial. Barr's job as a member of the Plaintiffs' Steering Committee's four-person executive council will be to coordinate litigation procedures for hundreds of other lawyers representing individual plaintiffs.

--Judiciary--

JUDGE TURNER: PLEASE LET ME BACK ON THE BENCH. NO DECISION EXPECTED FOR WEEKS-- *Orlando Sentinel*, <http://www.orlandosentinel.com>, Oct. 29, 2010.

He admitted breaking campaign-finance regulations, financial-disclosure requirements and tax law, but Orange-Osceola Circuit Judge N. James Turner asked the Judicial Qualifications Commission Thursday [Oct. 28] not to throw him out of office. Turner, 64, was on trial, accused of being a bad judge. Among the many allegations was that he touched women at the Osceola County Courthouse, where he worked, as well as hugged and kissed one deputy clerk several times a day. Turner has been off work since April, when Chief Judge Belvin Perry Jr. suspended him. Testimony concluded Thursday, but there was no immediate verdict. The JQC will produce a written report and forward it to the Florida Supreme Court, which will make the final decision.

--Lawyer Ethics/Legal Discipline--

SCOTT ROTHSTEIN SCANDAL: ONE YEAR LATER-- *Sun-Sentinel*, <http://www.sun-sentinel.com>, Oct. 31, 2010.

Fallout from the largest fraud in South Florida history continues after the dark secret behind Scott Rothstein's success was revealed a year ago this week. The Ponzi schemer now sits in prison with limited contact from the outside world. While Rothstein's name has been wiped from buildings and billboards, the path of financial destruction left in his wake remains. With the one-year anniversary of the scandal, questions still loom. The Florida Bar has investigated 64 complaints against 49 RRA attorneys and all but four attorneys have been cleared by the Bar of any wrongdoing. Rothstein was disbarred.

--Civil Justice Issues--

JUDGE: 357 IDLE FORECLOSURE SUITS GONE IN 2 1/2 HOURS-- *The Bradenton Herald*, <http://www.bradenton.com>, Oct. 30, 2010.

The foreclosure case was filed in March 2007. Within a month, all of the parties were served with copies of the suit. Then, nothing. The court case sat idle for the next 3 1/2 years, seemingly forgotten among the thousands of foreclosures clogging the legal system. That was until Thursday, when 12th Circuit Court Judge Paul E. Logan dismissed it for inactivity. In the span of 2 1/2 hours, he threw out 357 foreclosure cases because they had been inactive for at least 10 months. The purge was part of an effort to reduce the backlog of open foreclosure cases, estimated at 12,000 in Manatee County alone. The target: A 62-percent reduction, or nearly 7,500 cases, before July.

JOE FRANCIS NOT THE ISSUE IN THIS CASE-- *Walton Sun/Panama City News Herald*, column, <http://www.waltonsun.com>, Oct. 30, 2010.

The column by *News Herald* editor Mike Cazalas states: "There is a reason media companies — and newspapers particularly — fight so hard to protect the rights provided by the First Amendment. And whether the proceedings against 'Girls Gone Wild' founder Joe Francis in federal civil court should remain open to the public, and the media, is a much bigger issue than the case itself. . . . Now we have the current case, the one that had Freedom Communications' First Amendment and public records attorney John Bussian giving oral arguments before the 11th Circuit Court of Appeals in Atlanta last week. In that case, four women sued Francis, saying they were under 18 when they were filmed in various stages of undress. They are now in their early-to-mid-20s. But as this case moves near trial, attorneys for the plaintiffs have become desperate in their attempts to protect the women's identities. . . . Freedom Communications fought that under the basic premise that courtrooms are open forums and it is not the government's job to tell the media what to report."

TOBACCO MISTRIAL: SPLIT JURY CAN'T AGREE ON SMOKER'S ADDICTION-- *Daytona Beach News-Journal*, <http://www.news-journalonline.com>, Oct. 30, 2010.

The case to decide the first of more than 130 local cigarette smokers' lawsuits against the tobacco industry ended in a mistrial Friday [Oct. 29], after a jury deliberated for more than 10 hours but could not break a deadlock. Seventh Circuit Judge Robert K. Rouse Jr. told the three men and three women on the jury of Koballa v. R.J. Reynolds Tobacco Co. that it "was the second time in 15 years" a verdict could not be reached in his courtroom. Stella Koballa, 77, of Daytona Beach smoked for more than 48 years, beginning in 1948 when she was a teenager. Koballa's attorneys said she suffered lung cancer and chronic obstructive pulmonary disease as a result of her long addiction to cigarettes. Jurors, who asked not to be identified, said they couldn't agree on the meaning of the word addiction.

--Criminal Justice Issues--

POST-CONVICTION HEARING FOR TAJ MAHAL OWENS CENTERS ON FAIR TRIAL--

Florida Today, <http://www.floridatoday.com>, Oct. 30, 2010.

Three years ago, Taj Mahal Owens was sent away to prison for 45 years after a jury found him guilty of attempted second-degree murder and shooting into an occupied motor vehicle. In 2004, Owens waited at a street corner in Melbourne and then shot into a vehicle occupied by his former girlfriend Anntwinnett Dixon and Edmund Cochrane, according to law enforcement authorities. On Friday [Oct. 29], attorneys representing Owens at a post-conviction relief hearing granted by Judge George Maxwell said the two public defenders representing Owens at the time failed to interview two potential alibi witnesses and did not provide Owens proper advice regarding a plea offer. The two public defenders -- Christopher Beres and Terry Locy -- who no longer work for that office, were subpoenaed to appear in court Friday. Beres said the state offered Owens a plea deal of 25 years but he advised his client to reject it, in part, because he believed Cochrane was not going to show up as a witness. Cochrane turned up at the trial and testified identifying Owens as the shooter.

SHERIFF MORGAN WILL LIMIT HIS HELLOS-- *Pensacola News Journal*, <http://www.pnj.com>, Oct. 30, 2010.

Escambia County Sheriff David Morgan agreed Friday [Oct. 29] to a judge's request to stop greeting jury pools who assemble in the courthouse Monday mornings for jury duty. Meanwhile, at least two defense attorneys said Friday they are filing motions for retrials for their convicted clients, claiming Morgan could have unduly influenced jury members. Public Defender James Owens and a group of criminal defense attorneys complained in letters to Chief Judge Terry Terrell on Thursday [Oct. 28] that Morgan's talks with jurors may unfairly sway them to law enforcement's side in criminal cases. For the past several months, Morgan has appeared before citizens summoned to the M.C. Blanchard Judicial Building on Monday mornings to thank them for their public service. Before that, as prospective jurors board a trolley for the ride from a parking lot near the Pensacola Civic Center to the state or federal courthouse, Morgan greets them, hands them a business card and thanks them for their service. Morgan agreed to discontinue his greetings to jury assemblies, but Terrell declined to stop Morgan from going to the trolley stop because the parking lot is a public place.

BABY SHANNON'S MOTHER RELEASED AFTER FELONY CHARGE DROPPED-- *Northwest Florida Daily News*, <http://www.nwfdailynews.com>, Oct. 30, 2010.

The case that made national headlines last year when "Baby Shannon" went missing came to a quiet end Friday for the baby's mother, as she pleaded no contest to a misdemeanor charge and was released from jail. Crystina Mercer, who was jailed for providing false information to law enforcement, was given credit for time served. Shannon Dedrick disappeared from her home Oct. 31, 2009. The ensuing five-day search for Baby Shannon was the largest operation in the history of the Washington County Sheriff's Office. The child was located Nov. 4 in a latched wooden box under the bed of her baby sitter, Susan Baker. Baker was convicted Oct. 1 after a weeklong trial on charges of aggravated child abuse, interference with custody and providing false information to law enforcement. Because the state maintains Baker stole the baby, Mercer's 911 call after Shannon's disappearance was legitimate, authorities said. Since Baker stole the baby, Mercer didn't interfere with custody.

--Other--

MONEY WOES CAN BE EARLY CLUE OF ALZHEIMER'S-- *The Gainesville Sun*, <http://www.gainesville.com>, Oct. 31, 2010.

The article is by *The New York Times*. One day, it all came crashing down. The homeowners' association called asking for their fees. To Mrs. Packel's surprise, her husband had simply stopped paying them. Then she learned he had stopped writing checks to his creditors, too. It turned out that Mr. Packel was developing Alzheimer's disease and had forgotten how to handle money. New research shows that one of the first signs of impending dementia is an inability to understand money and credit, contracts and agreements. It is not just families who are affected -- financial advisers and lawyers say they are finding themselves in a bind when their clients' minds seem to be slipping. For lawyers, the main question is at what point a client lacks the

capacity to execute a will or other document, and who decides when that point has been reached.

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From the South Florida Business Journal

:<http://www.bizjournals.com/southflorida/print-edition/2010/10/22/rothstein.html>

SUBSCRIBER CONTENT: Oct 22, 2010, 6:00am EDT

A year after Rothstein, many questions unanswered

Paul Brinkmann

It's been a year since South Florida learned that Scott W. Rothstein was a Ponzi schemer and not just an eccentric, flashy attorney.

Rothstein's victims are just starting to recover: Charities still have gaping holes in their budgets, and law firms are still pecking over the carcass of his former law firm, **Rothstein Rosenfeldt Adler**, in bankruptcy court.

The Florida Bar found no cause to investigate 31 former RRA attorneys, and only three cases remain open.

Federal authorities moved relatively quickly to indict Rothstein on Dec. 1, after a period during which he helped them bring down reputed mafia members.

However, federal prosecutors have only indicted two people related to the scheme: Rothstein and his firm's COO, Debra Villegas.

Rude awakening

Like a fairy tale gone bad, Rothstein's rags-to-riches story proved to be an illusion noteworthy even by South Florida standards.

For four years, Rothstein grinned and glad-handed his way onto billboards and society pages. He threw money around like candy at a parade. He got a former judge, an ex-mayor and a felonious former sheriff to work for him.

But, quicker than his meteoric rise, Rothstein was suddenly gone one day – to Morocco. The money was gone, too, in a \$1.2 billion Ponzi scheme.

That was Oct. 27, 2009. He returned to Florida on Nov. 3.

For a month, Rothstein was seen in various spots around town, apparently oblivious, promising to pay people back.

The story trickled out about how lurid Rothstein was, including allegations of blackmailing

people to invest in his phony lawsuit settlements.

Finally, on Dec. 1, Rothstein was handcuffed and charged.

At the time, Daniel Auer, IRS special agent in charge, promised: "We will continue to move forward with this investigation, wherever it leads, and we will bring to justice those who defrauded the American public and members of our community out of their hard-earned money."

A year later, the government has taken its time in fulfilling that promise.

Rothstein told the *South Florida Sun-Sentinel* in November that Fort Lauderdale was "a town full of thieves."

Federal investigation

Rothstein was sentenced to 50 years in prison on June 9.

Authorities charged Villegas on April 27; she pleaded guilty and was sentenced Oct. 4 to 10 years.

Their sentencing judges, U.S District Judges James I. Cohn and William Zloch, noted that Rothstein and Villegas would have further sentencing reductions if they continue cooperating with authorities.

John Gillies, FBI special agent in charge for Miami, summed up Villegas' crime with these words: "She chose greed over her integrity."

Cohn ruled Aug. 30 that about 300 victims were entitled to \$363 million in restitution, although only \$50 million to \$60 million is available. A select list of non-investor clients was made completely whole.

At the end of October, people close to the Rothstein investigations were predicting more arrests were imminent.

"For the first year, the government apparently wanted to move slowly," said William Scherer, an attorney representing investors in a \$150 million lawsuit. "It has seemed like five years' worth of news in one year."

Bankruptcy case

Rothstein's law partner, Stuart Rosenfeldt, tried to put the firm into a state court receivership the day after Halloween 2009. But, several Rothstein victims soon petitioned for a bankruptcy court filing.

In bankruptcy court, attorneys for trustee Herbert Stettin have sued dozens of people to recover money in civil claims.

Rothstein's biggest feeder, George Levin, agreed to settle claims against him by turning in assets valued at up to \$200 million. Auto dealership owner Ed Morse, another Rothstein chum, settled for \$30 million.

Stettin and attorneys in the RRA bankruptcy, including Miami-based Berger Singerman, often clashed with federal authorities over the firm's assets. Cohn has granted the bankruptcy estate custody of RRA's former bank accounts, but federal authorities marshaled other assets, including boats and houses.

Investor lawsuit

The Rothstein investor lawsuit could be the largest such lawsuit in Broward County history at 2,200 pages, with more than two dozen plaintiffs and two dozen defendants.

The big targets are **TD Bank** and Gibraltar Private Bank & Trust, banks that handled Rothstein's money, but have denied knowing it was dirty. The investor lawsuit handled by Scherer is just starting to schedule depositions of key witnesses.

TD Bank's attorneys have sought more time to depose witnesses and ask questions of the plaintiffs. So far, Judge Jeffrey Streitfeld has declined to put limits on depositions.

On Oct. 20, the federal Office of Thrift Supervision slapped Gibraltar with a cease and desist order for weak money laundering controls. The bank has declined to comment on whether the order is related to the Rothstein scandal, but is operating under restrictions on how it accepts deposits and compensates officers.

Florida Bar takes little action

The Florida Bar has taken relatively little action in response to one of the biggest crises in its history.

Last November, Rothstein agreed to disbarment on consent.

Bar President Jesse Diner issued a statement at the time, saying the Rothstein scandal was "a terribly unfortunate and tragic situation, but it is also a rare circumstance in the legal profession."

At the time, Diner said the Bar would "continue to investigate any violations of its rules by other attorneys who may have been involved in this case."

The Bar originally opened investigations into 34 former RRA attorneys. At the end of June, it announced that 21 of those cases were closed. When asked by the *Business Journal* for an update on Oct. 19, the Bar said only three of those cases remain open: Rosenfeldt, Russell Adler and Steven Lippman. Rosenfeldt is also fighting a \$10 million claim in the bankruptcy case.

Where is Rothstein?

Few people know where Rothstein is, except that he is supposed to be in federal prison. His name does not come up in a public website search for prisoners' names because he is still cooperating with federal investigators. Rothstein professed remorse in court, but that had little effect on his sentence.

In a June 3 letter to Cohn, Rothstein wrote: "I do not really possess the words to adequately explain the magnitude of what I have done, why I did it, and the overwhelming remorse and self-loathing I feel about myself and the intense harm and pain I have inflicted upon innocent people."

Whether South Floridians have changed their reaction to Rothstein-type personalities in business remains to be seen.

"I think people are being more careful with flamboyant personalities, particularly charities and investors," Scherer said. "We saw that Rothstein could buy political good will and stature. But there have always been frauds, and there will always be."

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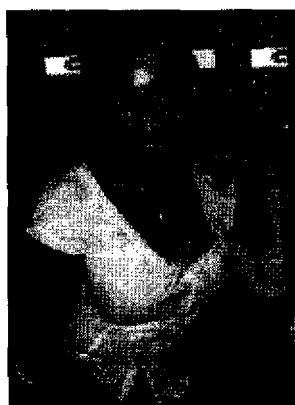
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Florida Bar looking at 35 former senior lawyers from Rothstein's firm

January 13, 2010 | By Amy Sherman and Jay Weaver, The Miami Herald

The Florida Bar is investigating at least 35 former senior lawyers from a law firm headed by Scott Rothstein, who was disbarred before using the firm to run a \$1.2 billion investment racket.

The Bar confirmed to *The Miami Herald* on Wednesday that the former firm -- Rothstein Rosenfeldt Adler -- lied about its finances and whether they stole any of it.

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Rothstein is scheduled to plead guilty Jan. 27 to federal recharges stemming from his massive Ponzi scheme, which funds.

Several of Rothstein's former partners have said they were law firm to sell bogus legal settlements to wealthy investors without mentioning names, have said that some of the law culpability."

The Florida Bar board of governors and its president, Jess Rothstein in early November when word of the scandal broke pursue the probe into the other lawyers.

"The Bar takes this issue very seriously," Diner, a Fort Lauderdale actively investigating and will pursue remedies against an investigation didn't stop with Scott Rothstein.

"This is a terrible thing that has happened to the legal profession the profession and the public to fully investigate this thing.

Diner said that Bar investigators will first determine whether made any false representations to the Bar when they certify annually certify such accounts, which are used to hold client memberships.

He also said Bar investigators will determine whether any misappropriated money from client trust accounts -- as Roth admitted doing when he agreed to be disbarred voluntarily

Diner said the Bar, which plays the role of a regulatory body punishment ranging from a public reprimand to suspension

According to the federal criminal charges, Rothstein raided firm held at Toronto Dominion Bank in Broward County.

The Bar initially disclosed in November that it was investigating fall: name partners Stuart Rosenfeldt and Russell Adler, a general counsel David Boden.

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But additional attorneys have received letters from the Bar investigation, said Howard Greitzer, a Fort Lauderdale attorney

Meanwhile, Rothstein appeared in federal court Wednesday who worked at his firm, has no conflicts of interest in representing his upcoming guilty plea cannot be appealed.

Prosecutors have said that Nurik is not under criminal inve



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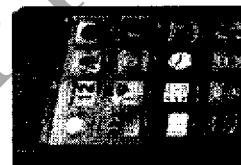
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22 former Scott Rothstein attorneys cleared by The Florida Bar

> Posted by Admin at 1:19 PM

By Peter Franceschina
Sun Sentinel

The Florida Bar has cleared 22 former attorneys who worked at the Rothstein Rosenfeldt Adler law firm of any wrongdoing during the time Ponzi schemer Scott Rothstein was running a massive \$1.4 billion fraud scheme.

The Bar recently sent out letters notifying the cleared attorneys that a grievance committee found no probable cause of any wrongdoing.

Fourteen other attorneys – including name partners Stuart Rosenfeldt and Russell Adler – remain under investigation, according to Bar spokeswoman Karen Kirksey. The cases involving those 14 attorneys have not yet been heard by the grievance committee.

The Bar is investigating whether any of the firm's top lawyers were involved in any trust account irregularities at the firm. Rothstein, 48, ran his fraud scheme using the now-bankrupt firm's trust accounts. Bankruptcy records show hundreds of millions of dollars flowing in and out of those accounts.

According to the Bar, the cleared lawyers are:

Steven L. Abrams
Shawn L. Birken
Harold S. Bofshever
Robert C. Buschel
Sara Coen-Giovanelli
Mark S. Fistos
Scott A. Goldstein
Julio E. Gonzalez Jr.
Frank Herrera
Steven R. Jaffe
Christina M. Kitterman
Seth Michael Lehrman
Arthur C. Neiworth
Steven H. Osber

John Michael Ross
Adam J. Steinberg
Richard B. Storer
Osvaldo F. Torres
Matthew D. Weissing
Johnny Williams Jr.
Tami R. Wolfe
Blandin J. Wright

The attorneys who have not yet had their cases heard, according to the Bar, are:

Russell Adler
William J. Berger
David J. Boden
Gary M. Farmer Jr.
Denis A. Kleinfeld
Carl H. Linder
Steven N. Lippman
Marc S. Nurik
Michael A. Pancier
Carlos J. Reyes
Stuart A. Rosenfeldt
Grant J. Smith
Barry J. Stone
Les Stracher

The Sun Sentinel obtained a copy of a Bar letter sent last week to one of the cleared attorneys. It is titled, "Notice of no probable cause and letter of advice to accused."

The letter says the attorney held himself out as a "partner" at Rothstein Rosenfeldt Adler when only Rothstein and Rosenfeldt held equity in the firm (they were 50 percent partners), but the Bar acknowledged that the practice is customary around the country.

The Bar apparently heard the cases first involving attorneys who were considered "partners," and those who have not had their cases heard yet were considered "shareholders."

It appears the Bar is also looking at whether some of the RRA attorneys were involved in campaign finance violations. Federal prosecutors alleged in their criminal charges against Rothstein that employees of the firm violated state and federal election law by being reimbursed for political contributions.

"The Bar also became aware of allegations that lawyers at RRA may have engaged in actions that constituted violations of campaign finance law," the letter says. "It was alleged that lawyers at RRA were instructed to make political campaign contributions that were then reimbursed to the lawyer from funds at RRA."

The lawyer who received the clearance letter "denied having knowledge of any trust account irregularities before the news accounts of Mr. Rothstein fleeing the United States and thereafter being prosecuted criminally. You denied that you were ever reimbursed for making campaign contributions or that you were ever asked to do so," according to the letter.

The letter goes on to caution the attorney about proper trust account procedures and to observe standards of professional conduct.

POSTED IN: Scott Rothstein (109)

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COMMENTS

Aw come on, isn't looking the other way a crime?

Posted by: i'm no lawyer | July 1, 2010 2:19 PM

Is anyone but me tired and disgusted at haveing to look at this crooks smiling face every time the Sun-Sentinel runs a story on him.

Posted by: Robert | July 1, 2010 2:30 PM

Free Russell!!!

Posted by: docdecay | July 1, 2010 3:00 PM

What about the suspicious employess that worked there? I heard that Andrew Barnett was involved in this fiasco along with others.

Posted by: Steven | July 1, 2010 3:27 PM

What about the suspicious employess that worked there? I heard that Andrew Barnett was involved in this fiasco along with others.

Posted by: Steven | July 1, 2010 3:29 PM

Some damn fine lawyers (and former judges) are still in the soup, it looks like. My guess? The ones that didn't just hold themselves out as partners, but were actually partners, are still being investigated for Trust accounting violations. Too bad. But they were supposed to keep track of the accounts. Non-delegable duty, I'm afraid. It anint fair, given the custom of letting the major sharholders do all the accounting. Practice will change as a result.

Posted by: Wait-A-Minute | July 1, 2010 4:27 PM

And how many of these newly FL Bar cleansed attorneys laundered RRA money for political contributions to Charlie Crist, John McCain, et al?

Posted by: And What About | July 1, 2010 6:10 PM

Need a pic? Doesn't he have a mug-shot you could use?

I think the smug "I'm a Rock Star" before shot, is best.

Posted by: Cheese | July 1, 2010 6:44 PM

What a joke the Bar is you saps. Its a country club for lawyers. Do you really think they're going to revoke somebody's membership in the club for committing a crime? They're slapping each other on the back laughing at the farce they just pulled off...

Posted by: andrew learnmonth | July 1, 2010 9:25 PM

Not sure what all the fuss is about. 99 per cent of the firm had no clue about any wrongdoing and there was no reason to believe so.

Posted by: ron huckster | July 2, 2010 12:13 AM

Shawn Birken? Judge Birken's son? That clears up the mystery why an incompetent like Judge Birken's wife, Barbara McCarthy was appointed to the bench by Charlie.

Posted by: Stan | July 2, 2010 8:10 AM

What about Pedro Dijols??????

Posted by: Greg | July 2, 2010 8:35 AM

The bar giving press releases involving attorneys under investigation is their attempt to look like the knight riding in on his big horse to save the poor public from these cretins. leave it to a group headed by Jesse Diner to be full of itself.

Posted by: klato | July 2, 2010 8:36 AM

Isn't not getting back to clients about their case make clients wonder if the attorney they believe in are really innocent or guilty?

Posted by: LiLLY | July 2, 2010 2:17 PM

The Florida Bar is a criminal enterprise. And no one can reign them in, so the best thing to do is ignore them until they go away.

Posted by: Dumbfounded | July 4, 2010 1:23 AM

Nice, So I wonder how much the Fla Bar was paid to clear these names. You can't tell me that they knew "NOTHING" about a major scheme that was happening in their very office. Unbelievable..

Posted by: Not surprised | July 18, 2010 11:51 AM

POST A COMMENT

Name:

Email Address:

URL:

☐ Remember personal info?

Comments: (you may use HTML tags for style)

To help keep spam off our site, please enter the letter "q" in the field below:

[Preview](#) [Post](#)

NOT A CERTIFIED COPY



Bradley J. Edwards
Direct Dial: 954-315-7266
bedwards@rra-law.com

July 22, 2009

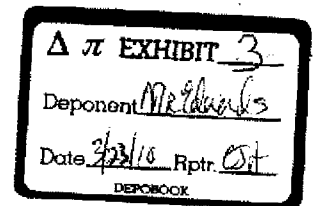
Via Facsimile:

305-931-0877 Adam D. Horowitz, Esquire
Stuart S. Mermelstein, Esquire
561-832-7137 Isidro Manuel Garcia, Esquire
305-931-0877 Jeffrey Marc Herman, Esquire
305-358-2382 Katherine Earthen Ezell, Esquire
Robert C. Josefsberg, Esquire
561-684-5707 Jack Hill, Esquire

Dear Counsel,

We have recently received Notice for Depositions from Adam Horowitz for several witnesses and the lever from Jack Hill indicating an intent to take others. We intend to Cross-Notice each deposition. Additionally, we intend to set the following other individuals for video deposition:

1. Donald Trump (West Palm Beach)
2. Glen Dubin (West Palm Beach)
3. Ghislain Maxwell (New York)
4. Sara Keller (New York)
5. Leslie Wexner (Ohio)
6. Bill Clinton (D.C.)
7. Paula-Heil.-(New York)
8. Jean -Luc Bruhel (New York)



Reply To: Las Olas City Centre • 401 East Las Olas Boulevard • Suite 1650 • Fort Lauderdale, Florida 33301 Telephone: (954) 522-3456 • Fax: (954) 527-8663

BOCA RATON • FORT LAUDERDALE • MIAMI • NEW YORK CITY • TALLAHASSEE • WASHINGTON D.C. • WEST PALM BEACH

EXHIBIT M

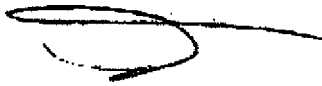
#3

July 22, 2009

Page 2 of 3

We will choose dates that have not already been occupied by other depositions already set in this case. If you would like to be included in the scheduling of these depositions, please provide me with your scheduling secretaries' names and e-mail addresses. If any of you do not need to be consulted regarding the scheduling of these depositions, please advise me of that as well.

Very truly yours,
ROTHSTEIN ROSENFELDT ADLER



Bradley J. Edwards, Esquire
Partner
Fort the Firm
BJE/mgl

NOT A CERTIFIED COPY

plead.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

NOTICE OF TAKING VIDEO DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Leslie Wexler on Friday, August 14, 2009, at 11:00 a.m., at:

McGinnis & Associates
5701 North High Street
Suite 300
Worthington, OH 43085
(614) 431.1344

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 28 day of July, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: US Legal Support
Court Reporters

WE HEREBY CERTIFY that a copy of the foregoing was mailed this 28th day of July, 2009, to:

Via regular mail and fax to:

Robert D. Critton, Jr., Esquire
515 N. Flagler Drive, Suite 400
West Palm Beach, Florida 33401
561-488-6929 fax

rcrit@bclclaw.com

Via email to:

Jack Patrick Hill
jph@searcylaw.com

Isidro Manuel Garcia
isidrogarcia@bellsouth.net

Katherine Warthen Ezell
Kezell@podhurst.com

Michael James Pike
Mpike@bclclaw.com

Paul G. Cassell
cassellp@law.utah.edu

Richard Horace Willits
lawyerwillits@aol.com

Robert C. Josefsberg
rjosefsbert@podhurst.com

Stuart S. Mermelstein
ssm@sexabuseattorney.com

Adam D. Horowitz
ahorowitz@sexabuseattorney.com

ROTHSTEIN ROSENFELDT ADLER
Attorneys for Plaintiff
401 East Las Olas Blvd., Suite 1650
Fort Lauderdale, Florida 33394
Telephone (954) 522-3456
Telecopier (954) 527-8663

By: 

Bradley J. Edwards
Florida Bar No. 542075

bedwards@rra-law.com

William J. Berger

Florida Bar No. 197701

wberger@rra-law.com

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Leslie H. Wexler, One Whitebarn Road, New Albany, Ohio 43054

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: McGinnis & Associates
5701 North High Street, Suite 300
Worthington, OH 43085

Date and Time:

08/14/2009 11:00 am

The deposition will be recorded by this method:

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 9/27/09

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Brad Edwards, Esq., ROTHSTEIN ROSENFELDT ADLER,

Attorneys for Plaintiff, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301, bedwards@rra-law.com

(954) 522 3456

Civil Action No. 08-80893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

✓
plead
pre-fed

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Ghislane Noelle Maxwell on **Monday, August 17, 2009**, at **11:00 a.m.**, at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

THEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 28 day of July, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: US Legal Support
Court Reporters

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: GHISLANE NOELLE MAXWELL, 116 E. 65 LLC, NEW YORK

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters

One Penn Plaza, Suite 4715, New York, NY 10119

Date and Time:

08/17/2009 11:00 am

The deposition will be recorded by this method:

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

9/27/09

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Brad Edwards, Esq., ROTHSTEIN ROSENFELDT ADLER,

Attorneys for Plaintiff, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301, bedwards@rra-law.com

(954) 522 3456

Civil Action No. 08-80893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the subpoena on the individual at *(place)* _____
on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

plead

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Glenn Russell Dubin on **Tuesday, August 18, 2009**, at **11:00 a.m.**, at

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I **HEREBY CERTIFY** that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 28 day of July, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: US Legal Support
Court Reporters

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UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Glenn Russell Dubin, 1010 5th Avenue, Unit 10A, New York, NY 10028

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters

One Penn Plaza, Suite 4715, New York, NY 10119

Date and Time:

08/18/2009 11:00 am

The deposition will be recorded by this method:

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 9/27/09

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Brad Edwards, Esq., ROTHSTEIN ROSENFELDT ADLER,

Attorneys for Plaintiff, 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301, bedwards@rra-law.com

(954) 522 3456

Civil Action No. 08-80893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____

☐ I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

plead

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80893CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Donald Trump on, **August 18, 2009, at 11:00 a.m.**, at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 11th day of **August, 2009** to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reports

NOT A CERTIFIED COPY

Service List

09-22785

Robert D. Critton, Jr., Esq.
BURMAN, CRITTON, ET AL.
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401

09-22785

Jay Howell & Assoc.,
644 Cesery Boulevard,
Suite 250,
Jacksonville, FL 32211

09-22785

Jack Alan Goldberger, Esq.,
Atterbury Goldberger et al.,
250 Australian Ave. South,
Suite 1400,
West Palm Beach, FL 33401.

09-22785

Paul G. Cassell, Esq.
382 South 1400 E
Room 101
Salt Lake City, UT 84112

09-22785

Jack Alan Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

8/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Nadia Marcinkova on Thursday, September 3, 2009, at 10:00 a.m., at:

Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 11th day of August, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-90893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Nadia Marcinkova, 301 E. 66th Street, New York, NY

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters, One Penn Plaza
Suite 4715, New York, NY

Date and Time:

09/03/2009 11:00 am

The deposition will be recorded by this method:

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Brad Edwards, Esq., Rothstein Rosenfeldt Adler, 401 E. Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301
Bedwards@rra-law.com. (954) 522 2346

Civil Action No. 08-90893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the subpoena on the individual at *(place)* _____
on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(D)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

8/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Mark Epstein on Monday, September 21, 2009, at 11:00 a.m., at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 11 day of August, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-90893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Mark Epstein, 301 E. 66th Street, New York, NY

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters, One Penn Plaza
Suite 4715, New York, NY

Date and Time:

09/21/2009 11:00 am

The deposition will be recorded by this method:

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:

Brad Edwards, Esq., Rothstein Rosenfeldt Adler, 401 E. Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301
Bedwards@rra-law.com, (954) 522 2346

Civil Action No. 08-90893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for (name of individual and title, if any) _____
was received by me on (date) _____.

☐ I personally served the subpoena on the individual at (place) _____
on (date) _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with (name) _____
_____, a person of suitable age and discretion who resides there,
on (date) _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on (name of individual) _____, who is
designated by law to accept service of process on behalf of (name of organization) _____
on (date) _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other (specify): _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

8/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Jean Luc Bruhel on Tuesday, **September 22, 2009**, at **10:00 a.m.**, at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 11~~th~~ day of August, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

Civil Action No. 08-90893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Jean Luc Bruhel, 301 E. 66th Street, New York, NY

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is not a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters, One Penn Plaza
Suite 4715, New York, NY

Date and Time:

09/22/2009 10:00 am

The deposition will be recorded by this method:

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date:

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

, who issues or requests this subpoena, are:
Brad Edwards, Esq., Rothstein Rosenfeldt Adler, 401 E. Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301
Bedwards@rra-law.com. (954) 522 2346

Civil Action No. 08-90893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the subpoena on the individual at *(place)* _____
on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*:

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

8/11/09 [signature]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re - NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Ghislane Noelle Maxwell on Wednesday, September 23, 2009, at 10:00 a.m., at:

Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 11/1 day of August, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

Service List

09-22785

Robert D. Critton, Jr., Esq.
BURMAN, CRITTON, ET AL.
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401

09-22785

Jay Howell & Assoc.,
644 Cesery Boulevard,
Suite 250,
Jacksonville, FL 32211

09-22785

Jack Alan Goldberger, Esq.,
Atterbury Goldberger et al.,
250 Australian Ave. South,
Suite 1400,
West Palm Beach, FL 33401.

09-22785

Paul G. Cassell, Esq.
382 South 1400 E
Room 101
Salt Lake City, UT 84112

09-22785

Jack Alan Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL33401-5012

09-22785
Robert D. Critton, Jr., Esq.
BURMAN, CRITTON, ET AL.
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401

09-22785
Jay Howell & Assoc.,
644 Cesery Boulevard,
Suite 250,
Jacksonville, FL 32211

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250 Australian Ave. South,
Suite 1400,
West Palm Beach, FL 33401.

09-22785
Paul G. Cassell, Esq.
382 South 1400 E
Room 101
Salt Lake City, UT 84112

09-22785
Jack Alan Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL33401-5012

8/24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80893CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

Re-**NOTICE OF TAKING VIDEOTAPED DEPOSITION**

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Donald Trump on, September 24, 2009, at 11:00 a.m., at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 24 day of **August, 2009** to all those on the
attached Service List.

101

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By:



BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reports

NOT A CERTIFIED COPY

9/2 ✓

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re- NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Sarah Kellen on October 19, 2009, at 10:00 a.m., at:

Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119

The deposition shall be conducted pursuant to the Federal Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 2 day of September, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By:  *SML* *fsj*

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

Service List

09-22785

Robert D. Critton, Jr., Esq.
BURMAN, CRITTON, ET AL.
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33401

09-22785

Jay Howell & Assoc.,
644 Cesery Boulevard,
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Jacksonville, FL 32211

09-22785

Jack Alan Goldberger, Esq.,
Atterbury Goldberger et al.,
250 Australian Ave. South,
Suite 1400,
West Palm Beach, FL 33401.

09-22785

Paul G. Cassell, Esq.
382 South 1400 E
Room 101
Salt Lake City, UT 84112

09-22785

Jack Alan Goldberger, Esq.
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL33401-5012

9/2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

Re- NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Nadia Marcinkova on **October 20, 2009**, at **10:00 a.m.**, at:

**Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119**

The deposition shall be conducted pursuant to the Federal Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 8 day of September, 2009 to all those on the
attached Service List.

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

pldys
2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 08-CIV -MARRA/JOHNSON

JANE DOE,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

Re - NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that the Plaintiff, JANE DOE, will take the deposition of
Ghislane Noelle Maxwell on October 26, 2009, at 10:00 a.m., at:

Esquire Court Reporters
One Penn Plaza
Suite 4715
New York, NY 10119

The deposition shall be conducted pursuant to the Florida Rules of Civil Procedure
and shall continue day to day, weekends and holidays excepted, until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served
by U.S. Mail and email transmission this 16th day of October, 2009 to all those on the
attached Service List.

received f.e-mail
12.01.16

ROTHSTEIN ROSENFELDT ADLER

Attorneys for Plaintiff

401 East Las Olas Blvd., Suite 1650

Fort Lauderdale, Florida 33301

Tel: (954) 522-3456

Fax: (954) 527-8663

Email: bedwards@rra-law.com

By: 

BRAD EDWARDS, ESQ.

Florida Bar No.: 542075

cc: Esquire Court Reporters

NOT A CERTIFIED COPY

CERTIFICATE OF SERVICE
SERVICE LIST

Jane Doe v. Jeffrey Epstein
United States District Court, Southern District of Florida

Jack Alan Goldberger, Esq.
Jgoldberger@agwpa.com

Robert D. Critton, Esq.
rcritton@bcclaw.com

Isidro Manual Garcia
isidrogarcia@bellsouth.net

Jack Patrick Hill
iph@searcyaw.com

Katherine Warthen Ezell
KEzell@podhurst.com

Michael James Pike
MPike@bcclaw.com

Paul G. Cassell
cassellp@bcclaw.com

Richard Horace Willits
lawyerswillits@aol.com

Robert C. Josefsberg
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William J. Berger
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page 2

UNITED STATES DISTRICT COURT

for the
Southern District of New York

Jane Doe

Plaintiff
v.
Jeffrey Epstein

Defendant

Civil Action No. 08-80893 CIV-MARRA

(If the action is pending in another district, state where:
Southern District of Florida

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Ghisland Noelle Maxwell, 116 East 65 LLL, New York, NY

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters, One Penn Plaza Suite 4715, New York, NY	Date and Time: 10/26/2009 10:00 am
--	---------------------------------------

The deposition will be recorded by this method:

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Schedule A attached

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 09/21/2009

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Jane Doe

, who issues or requests this subpoena, are:

Brad Edwards, Esq., Rothstein Rosenfeldt Adler, 401 E. Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301
Bedwards@rra-law.com. (954) 522 2346

offer

Civil Action No. 08-80893 CIV-MARRA

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

☐ I personally served the subpoena on the individual at *(place)* _____
on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(ii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

Schedule "A" to the Subpoena Duces Tecum
of Ghislane Maxwell

A list of all girls that Defendant, Epstein, had at his house at 358 El Brillo Way for any reason at any time, including guests and masseuses for the entire duration when you worked with or for Jeffrey Epstein.

A list of all girls that Defendant, Epstein, had at his house in Manhattan for any reason at any time, including guests and masseuses for the entire duration when you worked with or for Jeffrey Epstein.

Any and all documents that reflect scheduling and/or appointments for Epstein's flights, travels, accommodation, massages or meetings for the entire duration when you worked with or for Jeffrey Epstein.

A complete list of all girls whom you know to have flown in any of Defendant, Epstein's airplanes or jets at anytime during the time you worked with or for Jeffrey Epstein.

Any and all diaries and/or notes and/or logs that in any way relate to Defendant Epstein, his airplanes, his properties, his assets and/or his finances.

UNITED STATES DISTRICT COURT
for the
Southern District of New York

Jane Doe
Plaintiff
v.
Jeffrey Epstein
Defendant

Civil Action No. 08-80893 CIV-MARRA

(If the action is pending in another district, state where:
Southern District of Florida

**SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION**

To: Ghisland Noelle Maxwell, 116 East 65 LLL, New York, NY

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Esquire Court Reporters, One Penn Plaza
Suite 4715, New York, NY

Date and Time:
10/26/2009 10:00 am

The deposition will be recorded by this method:

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Schedule A attached

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 09/21/2009

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's Signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Jane Doe

, who issues or requests this subpoena, are:
Brad Edwards, Esq., Rothstein Rosenfeldt Adler, 401 E. Las Olas Blvd., Suite 1650, Fort Lauderdale, Florida 33301
Bedwards@rra-law.com. (954) 522 2346

18.01
no

UNITED STATES DISTRICT COURT

for the
Central District of California

Jane Doe

Plaintiff

v.

Jeffrey Epstein

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

Southern District of Florida

SUBPOENA TO TESTIFY AT A DEPOSITION OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Michael Freidman, 53320 Avenida Madero, La Quinta, CA 92253

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is *not* a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Farewell Court Reporters
50505 Spyglass Hill Dr, La Quinta, CA

Date and Time:

11/19/2009 10:00

The deposition will be recorded by this method: Court Reporter

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 10/22/2009

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Jane Doe

, who issues or requests this subpoena, are:

Brad Edwards, Rothstein Rosenfeldt Adler, Suite 1650, 401 E. Las Olas Blvd. Fort Lauderdale, FL 33301.
954 522 3456, Bedwards@RRA-law.com.

UNITED STATES DISTRICT COURT

for the
Central District of California

Jane Doe

Plaintiff

v.

Jeffrey Epstein

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

Southern District of Florida

SUBPOENA TO TESTIFY AT A DEPOSITION
OR TO PRODUCE DOCUMENTS IN A CIVIL ACTION

To: Rosalie Freidman, 53320 Avenida Madero, La Quinta, CA 92253

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Date: 10/22/2009

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Jane Doe

, who issues or requests this subpoena, are:

Brad Edwards, Rothstein Rosenfeldt Adler, Suite 1650, 401 E. Las Olas Blvd. Fort Lauderdale, FL 33301.
954 522 3456. Bedwards@RRA-law.com.

UNITED STATES DISTRICT COURT

for the
Central District of California

Jane Doe

Plaintiff

v.

Jeffrey Epstein

Defendant

Civil Action No. 08-80893CIV-MARRA/JOHNSO

(If the action is pending in another district, state where:

Southern District of Florida

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To: Michael Sanka, 449 South Beverly Drive, Suite #101, Beverly Hills, Ca 92253

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Place: 433 North Camden Drive, 4th floor, Beverly Hills, FL 90210

Date and Time:

11/19/2009 10:00

The deposition will be recorded by this method: Court Reporter

- ☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

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OR

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party)

Jane Doe

, who issues or requests this subpoena, are:

Brad Edwards, Rothstein Rosenfeldt Adler, Suite 1650, 401 E. Las Olas Blvd. Fort Lauderdale, FL 33301, 954 522 3456, Bedwards@RRA-law.com.

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

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(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

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(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

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(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) *Contempt.* The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

Civil Action No. 06-80893CIV-MARRA/JOHNSO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____

☐ I personally served the subpoena on the individual at *(place)* _____
_____ on *(date)* _____; or

☐ I left the subpoena at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the subpoena on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because _____; or

☐ Other *(specify)*: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

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

JEFFREY EPSTEIN,

Complex Litigation, Fla. R. Civ. Pro. 1.201
CASE NO.

Plaintiff,

v.

50 2009 CA 0 4 03 9 0 XXX MB

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

Defendants.

COPY
RECEIVED FOR FILING
DEC 07 2009

COMPLAINT

Plaintiff, JEFFREY EPSTEIN, (hereinafter "EPSTEIN"), by and through his undersigned attorneys, files this action against Defendants, SCOTT ROTHSTEIN, individually, BRADLEY J. EDWARDS, individually, and L.M., individually. Accordingly, EPSTEIN states:

SUMMARY OF ACTION

Attorney Scott Rothstein aided by other lawyers and employees at the firm of Rothstein, Rosenfeldt, and Adler, P.A. for personal greed and enrichment, in betrayal of the ethical, legal and fiduciary duties to their own clients and professional obligations to the administration of justice, deliberately engaged in a pattern of racketeering that involved a staggering series of gravely serious obstructions of justice, actionable frauds, and the orchestration and conducting of egregious civil litigation abuses that resulted in profoundly serious injury to Jeffrey Epstein one of several targets of their misconduct

and others. Rothstein and RRA's fraud had no boundary; Rothstein and his co-conspirators forged Federal court orders and opinions. Amongst the violations of law that are the subject of this lawsuit are the marketing of non-existent Epstein settlements and the sanctioning of a series of depositions that were unrelated to any principled litigation purpose but instead designed to discover extraneous private information about Epstein or his personal and business associates (including well-known public figures) in order to defraud investors and support extortionate demands for payment from Epstein. The misconduct featured the filing of legal motions and the pursuit of a civil litigation strategy that was unrelated to the merits or value of their clients' cases and, instead, had as its improper purpose the furthering of Rothstein's misrepresentations and deceit to third party investors. As a result, Epstein was subject to abusive investigatory tactics, unprincipled media attacks, and unsupportable legal filings. This lawsuit is filed and will be vigorously pursued against all these defendants. The Rothstein racketeering enterprise endeavored to compromise the core values of both state and federal justice systems in South Florida and to vindicate the hardworking and honest lawyers and their clients who were adversely affected by the misconduct that is the subject of this Complaint.

Plaintiff reserves the right to add additional defendants – co-conspirators as the facts and evidence is developed.

GENERAL ALLEGATIONS

1. This is an action for damages in excess of \$15,000.00, exclusive costs, interest, and attorneys' fees.

2. Plaintiff, EPSTEIN, is an adult and currently is residing and works in Palm Beach County, Florida.

3. Defendant, SCOTT ROTHSTEIN ("ROTHSTEIN"), is an individual residing in Broward County, Florida, and was licensed to practice law in the State of Florida. In November 2009, ROTHSTEIN voluntarily relinquished his law license in the midst of the implosion of Rothstein, Rosenfeldt and Adler, P.A. ("RRA"). He was disbarred by the Florida Supreme Court on November 20, 2009. On December 1, 2009, ROTHSTEIN was arrested and arraigned in Federal Court in Broward County, Florida.

4. At all times relevant hereto, ROTHSTEIN was the managing partner and CEO of RRA.

5. Defendant, ROTHSTEIN and Stuart Rosenfeldt, are and were the principal owners of equity in RRA and each co-founded RRA.

6. Defendant, BRADLEY J. EDWARDS ("EDWARDS"), is an individual residing in Broward County, Florida and is licensed to practice law in the State of Florida. At all times relevant hereto, EDWARDS was an employee, agent, associate, partner, shareholder, and/or other representative of RRA.

7. Defendant, L.M. ("L.M."), is an individual residing in Palm Beach County, Florida. At all times relevant hereto, L.M. was represented by RRA, ROTHSTEIN and EDWARDS in a civil lawsuit against Epstein and was an essential participant in the scheme referenced *infra* by, among other things, substantially changing prior sworn testimony, so as to assist the Defendants in promoting their fraudulent scheme for the

promise of a multi-million dollar recovery relative to the Civil Actions (defined below) involving Epstein, which was completely out of proportion to her alleged damages.

8. Non-party, RRA is a Florida Professional Service Corporation, with a principal address of 401 East Las Olas Blvd., Suite 1650, Fort Lauderdale, FL 33401. In addition to its principal office, RRA also maintained seven offices in Florida, New York, and Venezuela, and employed over 70 attorneys and 200 support staff. RRA also maintains an office at 1109 NE 2d Street, Hallendale Beach, Florida 33009-8515. RRA, through its attorneys, including those named as Defendants herein, conducted business throughout Florida, and relevant to this action, conducted business and filed lawsuits on behalf of clients in Palm Beach County, Florida. (RRA is currently a debtor in bankruptcy. RRA is not named as a Defendant).

FACTUAL ALLEGATIONS

9. The United States in United States of America v. Scott W. Rothstein, Case No. 09-60331CR-Cohn, United States District Court, Southern District of Florida, has brought an action for Racketeering Conspiracy, 18 U.S.C. § 1962(d) against Scott W. Rothstein who was the chief executive officer and chairman of RRA. Within the information which was filed, the United States of America has identified the enterprise as being the law firm, RRA, through which Rothstein in conjunction with "his co-conspirators" (not yet identified by the USA) engaged in the pattern of racketeering through its base of operation at the offices of RRA from sometime in 2005 up through and continuing into November of 2009. Through various criminal activities, including mail fraud, wire fraud and money laundering, the United States of America asserts that

Rothstein and his co-conspirators unlawfully obtained approximately \$1.2 billion from investors by fraud in connection with a Ponzi scheme. The USA further alleges that "Rothstein and co-conspirators initiated the criminal conduct alleged in the instant information in order to personally enrich themselves and to supplement the income and sustain the daily operation of RRA." In essence, in the absence of Rothstein and his co-conspirators conducting the Ponzi scheme, the daily operation of RRA, which included payroll (compensation to lawyers, staff, investigators, etc.), accounts payable including unlimited improper, harassing and potential illegal investigation on cases, including Epstein-related matters, would in all likelihood would not have been sustainable. A copy of the information is attached as Exhibit 1 to this action.

10. As more fully set forth herein, RRA held itself out as legitimately and properly engaging in the practice of law. In reality, ROTHSTEIN and others in RRA were using RRA to market investments, as described below, so as to bilk investors out of hundreds of millions of dollars. ROTHSTEIN and others in RRA devised an elaborate plan through which were sold purported confidential assignments of a structured pay-out settlements, supposedly reached on behalf of RRA for clients, in exchange for immediate payments to these clients of a discounted lump sum amount. Investors were being promised in excess of a 30% return on their investment which was to be paid out to the investors over time. While some of the cases relied upon to induce investor funding were existing filed cases, it is believed that the confidential, structured pay-out settlements were all fabricated.

11. Based on media reports, Federal Bureau of Investigation (FBI) press conferences and releases and the information the massive Ponzi scheme and pattern of criminal activity meant to lure investors began sometime in 2005 and continued through the fall of 2009, when the scheme was uncovered by some of the investors and the FBI. As of November of 2009, civil lawsuits were and continue to be filed against various Defendants as result of their massive fraudulent and criminal scheme.

12. This fraudulent and illegal investment scheme is also evidenced by the filing of *Amended Complaint For Dissolution And For Emergency Transfer of Corporate Powers to Stuart A. Rosenfeldt, Or, In The Alternative, For the Appointment of A Custodian or Receiver* by ROSENFELDT, and RRA, against ROTHSTEIN, individually. (Case No. 09 059301, In the Circuit Court of the Seventeenth Judicial Circuit, Broward County, Florida, Complex Business Div.), (hereinafter "RRA dissolution action, and attached hereto as Exhibit 2).

13. Plaintiff references the RRA dissolution action for the sole purpose that it acknowledges that RRA and ROTHSTEIN were in fact conducting an illegal and improper investment or Ponzi scheme based on promises of financial returns from settlements or outcomes of supposed legal actions, including the actions brought against Plaintiff EPSTEIN. The RRA dissolution action alleges in part that - "ROTHSTEIN, the managing partner and CEO of the firm (RRA), has, according to assertions of certain investors, allegedly orchestrated a substantial misappropriation of funds from investor trust accounts that made use of the law firm's name (RRA). The investment business created and operated by ROTHSTEIN centered around the sale of

interests in structured settlements." See *Preliminary Statement* of RRA dissolution action, Exhibit 2 hereto.

14. In furtherance of the scheme, RRA's letterhead was used in communications regarding investment opportunities in purported structured settlements. RRA's trust account was used to deposit hundreds of millions of dollars or wire transfer of monies from duped investors and other victims. RRA personally guaranteed payments.

15. Rothstein's scheme went so far as to manufacture false and fraudulent Court opinions/orders including forging the signatures of U.S. District Judge, Kenneth A. Marra and U.S. Circuit Court Judge, Susan H. Black, 11th Circuit in other cases. It is not yet known if he forged similar documents in Epstein related matters. See *Composite Exhibit 3* hereto.

16. The details of this fraudulent scheme are being revealed on a daily basis through various media reports and court documents. The most recent estimate of the financial scope of the scheme is that it exceeds \$1.2 billion dollars.

17. Relevant to this action, EPSTEIN is currently named as a defendant in three civil actions alleging, inter alia, sexual assault and battery that were handled by RRA and its attorneys including EDWARDS prior to its implosion – one of which is filed in federal court (*Jane Doe v. Epstein*, Case No. 08-CIV-80893, U.S.D.C. S.D. Fla.) (Jane Doe is a named Defendant herein), and two of which have been filed in state court in the 15th Judicial Circuit Court, Palm Beach County, State of Florida, (*L.M. v. Epstein*, Case No. 502008CA028051XXXXMB AB; *E.W. v. Epstein*, Case No. 502008CA028058XXXXMB

AB), (hereinafter collectively referred to as the "Civil Actions," and L.M is a named Defendant herein). The Civil Actions were all filed in August and September of 2008.

18. What is clear is that a fraudulent and improper investment or Ponzi scheme was in fact conducted and operated by RRA and certain of the named Defendants, which scheme directly impacted EPSTEIN as a named defendant in the Civil Actions.

19. Miami attorney and developer, Alan Sakowitz, was quoted in a November 2009 article as saying that he had met with ROTHSTEIN as a potential investor in August of 2009, but became suspicious. He stated "I was convinced it was all a Ponzi scheme and I notified the FBI in detail how Scotty ROTHSTEIN was hiding behind a legitimate law firm to peddle fake investments." Attorney Sakowitz was also quoted as saying ROTHSTEIN had sophisticated eavesdropping equipment and former law enforcement officers who would sift through a potential defendants' garbage looking for damaging evidence to use with investors to show how potential defendants could be in essence blackmailed into paying settlement that far exceeded the value of any legitimate damage claim.

20. Ft. Lauderdale attorney William Scherer represents multiple Rothstein related investors. He indicated in an article that RRA/Rothstein had used the "Epstein Ploy ... as a showpiece as bait. That's the way he raised all the money. He would use ... cases as bait for luring investors into fictional cases. All the cases he allegedly structured were fictional. I don't believe there was a real one in there." In fact, on November 20, 2009, William Scherer, on behalf of certain clients, filed a 147 page Complaint against ROTHSTEIN, David Boden, Debra Villegas, Andrew Barnett, TD Bank, N.A., Frank

Spinosa, Jennifer Kerstetter, Rosanne Caretsky and Frank Preve asserting various allegations that further prove the massive Ponzi scheme behind the RRA façade; and as of November 25, 2009, a 249 page Amended Complaint naming additional Defendants was filed.

21. In addition, and upon information and belief, ROTHSTEIN, David Boden, Debbie Villegas, Andrew Barnett, Michael Fisten and Kenneth Jenne (all employees of RRA) through brokers or middlemen would stage regular meetings during which false statements were made about the number of cases/clients that existed or RRA had against EPSTEIN and the value thereof. They would show and share actual case files from the EPSTEIN actions with hedge fund managers. Thus, the attorneys and clients have waived any attorney-client or work-product privileges that otherwise may have existed.

22. Because potential investors were given access to some of the actual Civil Action files, Investor-third parties may have become aware of a name of an existing Plaintiff who had filed anonymously against Epstein and had opposed disclosure of her legal name.

23. In all other instances, by RRA, ROTHSTEIN and EDWARDS claiming the need for anonymity with regard to existing or fabricated clients, they were able to effectively use initials, Jane Doe or other anonymous designations which was a key element in the fraudulent scheme. Fictitious names could be created to make the investors believe many other cases existed against Epstein.

24. In each of RRA's Civil Actions, the Plaintiffs are or were represented by RRA and its attorneys, including ROTHSTEIN and EDWARDS.

25. In addition, investors were told that in addition to the Civil Actions another fifty (50) plus anonymous females were represented by RRA, with the potential for hundreds of millions of dollars in settlements, and that RRA and its attorneys would sue Epstein unless he paid exorbitant-settlement amounts to protect his high-profile friends.

26. Upon information and belief, EDWARDS knew or should have known that ROTHSTEIN was utilizing RRA as a front for the massive Ponzi scheme and/or were selling an alleged interest or investment in the Civil Actions (and other claims) involving Epstein.

27. Further evidencing that EDWARDS (and possibly other attorneys of RRA) knew or should have known and participated in the continuation of the massive Ponzi scheme, a front-page Palm Beach Post article, dated November 24, 2009, reported on the recent filing of an amended forfeiture complaint by prosecutors against "dozens of ROTHSTEIN's real estate properties, foreign cars, restaurants and other assets – including \$12 million in the lawyer's bank account in Morocco, along with millions more donated to political campaigns and charitable funds." The article further reported that –

Attorney Scott ROTHSTEIN tapped into millions of dollars from his massive investment scam to cover payroll costs at his expanding Fort Lauderdale law firm, federal authorities said in court records released Monday.

ROTHSTEIN's law firm (RRA) generated revenue of \$8 million in one recent year, yet his 70-lawyer law firm had a payroll of \$18 million,

prosecutors said. ROTHSTEIN, who owned half of RRA used investors' money from his Ponzi scheme to make up the shortfall, they said.

Subsequent articles and court filings have reflected ROTHSTEIN received compensation in excess of \$35.7 million in 2008 and \$10.5 million in 2009, while his partner Rosenfeldt received greater than \$6 million in 2008.

28. ROTHSTEIN attempted to lure the entity known as D3 Capital Club, LLC, ("D3"), by offering D3 "the opportunity" to invest in a pre-suit \$30,000,000.00 court settlement against EPSTEIN; yet this supposed settlement never existed and was entirely fabricated. To augment his concocted story, ROTHSTEIN, upon information and belief, invited D3 to his office to view thirteen (13) banker's boxes of case files in Jane Doe (one of the Civil Actions)¹ in an attempt to substantiate that the claims against EPSTEIN were legitimate and that the evidence obtained against him by RRA, ROTHSTEIN, and EDWARDS (the "Litigation Team") was real.

29. Upon information and belief, ROTHSTEIN and others offered other investors like the entity D3 fabricated investment opportunities in the Civil Actions involving EPSTEIN. Fisten (a former Dade County police officer with a questionable police record and RRA investigator) and Jenne (a former attorney, Broward County Sheriff and felon) assisted ROTHSTEIN in making these offers by providing confidential, privileged and work-product information to prospective third-party investors.

¹ It appears that 13 out of the 40 boxes seized by the FBI as part of its investigation at RRA consisted of files relating to the Civil Actions involving EPSTEIN, as reported by counsel for the Bankruptcy Trustee. Until those boxes can be reviewed, as well as other discovery, Epstein will not know the depth of the fraud and those involved.

30. By using the Civil Actions against EPSTEIN as "bait" and fabricating settlements regarding same, ROTHSTEIN and others were able to lure investors into ROTHSTEIN'S lair and bilked them of millions of dollars which, in turn, was used to fund the litigation against EPSTEIN for the sole purpose of continuing the massive Ponzi scheme.

31. As part of this scheme, ROTHSTEIN and the Litigation Team, individually and in a concerted effort, may have unethically and illegally:

- a. Sold, allowed to be sold and/or assisted with the sale of an interest in non-settled personal injury lawsuits (which are non-assignable and non-transferable) or sold non-existent structured settlements (including those cases involving Epstein);
- b. Reached agreements to share attorneys fees with non-lawyers;
- c. Used investor money to pay plaintiffs (i.e., L.M., E.W. and Jane Doe) "up front" money such that plaintiffs would refuse to settle the Civil Actions;
- d. Conducted searches, wiretaps or intercepted conversations in violation of state or federal laws and Bar rules; and
- e. Utilized the judicial process including, but not limited to, unreasonable and unnecessary discovery, for the sole purpose of furthering the Ponzi scheme.

32. Any such actions by ROTHSTEIN, and other attorneys, including the Litigation Team, directly or indirectly, would potentially be a violation of various Florida Bar Rules,

including prohibiting the improper sharing of fees or costs and various conflicts of issues rules.

33. Evidencing that the Litigation Team knew or should have known of the improper purpose that ROTHSTEIN was pursuing in the continuation of the scheme, ROTHSTEIN used RRA's Litigation Team in the EPSTEIN cases to pursue issues and evidence unrelated to and unnecessary to the claims pled in the Civil Actions, but significantly beneficial to lure investors into the Ponzi scheme orchestrated by ROTHSTEIN and other co-conspirators.

34. Upon information and belief, ROTHSTEIN and others claimed their investigators discovered that there were high-profile individuals onboard Epstein's private jet where sexual assaults took place and showed D3 (and possibly others) copies of a flight log purportedly containing names of celebrities, dignitaries, and international figures.

35. For instance, the Litigation Team relentlessly and knowingly pursued flight data and passenger manifests regarding flights EPSTEIN took with these famous individuals knowing full well that no underage women were onboard and no illicit activities took place. ROTHSTEIN and the Litigation Team also inappropriately attempted to take the depositions of these celebrities in a calculated effort to bolster the marketing scam that was taking place.

36. One of Plaintiffs' counsel, EDWARDS, deposed three of EPSTEIN'S pilots, and sought the deposition of a fourth pilot (currently serving in Iraq). The pilots were deposed by EDWARDS for over twelve (12) hours, and EDWARDS never asked one question relating to or about E.W., L.M., and Jane Doe (RRA clients) as it related to

transportation on flights of RRA clients on any of EPSTEIN'S planes. But EDWARDS asked many inflammatory and leading irrelevant questions about the pilots' thoughts and beliefs (which will never be admissible at trial) which could only have been asked for the purposes of "pumping" the cases and thus by using the depositions to sell the cases (or a part of them) to third parties.

37. Because of these facts, ROTHSTEIN claimed that Epstein wanted to make certain none of these individuals would be deposed and therefore he had offered \$200,000,000.00 to settle the claims of RRA female clients various potential plaintiffs in actions against EPSTEIN. The offer of a \$200 million dollar settlement by EPSTEIN was completely fabricated; no such offer had ever been made.

38. EDWARDS' office also notified Defendant that he intended to take the depositions of and was subpoenaing:

- (i) Donald Trump (real-estate magnate and business mogul);
- (ii) Alan Dershowitz (noted Harvard Law professor, constitutional attorney and one of EPSTEIN'S criminal defense attorneys);
- (iii) Bill Clinton (Former President of the United States);
- (iv) Tommy Mottola (former President of Sony Record); and
- (v) David Copperfield (illusionist).

39. The above-named individuals were friends and acquaintances of EPSTEIN with whom he knew through business or philanthropic work over the years. None of the above-named individuals had any connection whatsoever with any of the Litigation Team's clients, E.W., L.M. or Jane Doe.

40. EDWARDS filed amended answers to interrogatories in the state court matters, E.W. and L.M., and listed additional high profile witnesses that would allegedly be called at trial, including, but not limited to:

- (i) Bill Richardson (Governor of New Mexico, formerly U.S. Representative and Ambassador to the United Nations); and
- (ii) Any and all persons having knowledge of EPSTEIN'S charitable, political or other donations;²

41. The sole purpose of the scheduling of these depositions or listing high profile friends/acquaintances as potential witnesses was, again, to "pump" the cases to investors. There is no evidence to date that any of these individuals had or have any knowledge regarding RRA's Civil Actions.

42. In furtherance of their illegal and fraudulent scheme against EPSTEIN, ROTHSTEIN, EDWARDS (who either know or should have known) and, at times, L.M. in her Civil Action against EPSTEIN:

- a) Included claims for damages in Jane Doe's federal action in excess of \$50,000,000.00 rather than simply alleging the jurisdictional limits.
- b) Organized a Jane Doe TV media interview without any legitimate legal purpose other than to "pump" the federal case for potential

² These high-profile celebrity "purported" witnesses have no personal knowledge regarding the facts on these "Three Cases", but were being contacted, subpoenaed or listed to harass and intimidate them and Epstein, and to add "star" appeal to the marketing effort of the Ponzi scheme.

investors or to prejudice Epstein's right to a fair trial in Palm Beach County.

- c) EDWARDS, Berger and Russell Adler (another named partner in RRA) all attended EPSTEIN's deposition. At that time, outrageous questions were asked of EPSTEIN which had no bearing on the case, but so that the video and questions could be shown to investors.
- d) Conducted and attempted to conduct completely irrelevant discovery unrelated to the claims in or subject matter of the Civil Actions for the purpose of harassing and embarrassing witnesses and EPSTEIN and causing EPSTEIN to spend tens of thousands of dollars in unnecessary attorneys' fees and costs defending what appeared to be discovery related to the Civil Actions but was entirely related to the furtherance of the Ponzi scheme.
- e) After EDWARDS was recruited and joined RRA in the spring of 2009, the tone and tenor of rhetoric directed to cases against EPSTEIN used by Attorney EDWARDS and Berger changed dramatically in addressing the court on various motions from being substantive on the facts pled to ridiculously inflammatory and sound-bite rich such as the July 31, 2009, transcript when EDWARDS stated to the Court in E.W./L.M.: "What the evidence is really going to show is that Mr. Epstein — at least dating back as

far as our investigation and resources have permitted, back to 1997 or '98 – has every single day of his life, made an attempt to sexually abuse children. We're not talking about five, we're not talking about 20, we're not talking about 100, we're not talking about 400, which, I believe, is the number known to law enforcement, we are talking about thousands of children. . . and it is through a very intricate and complicated system that he devised where he has as many as 20 people working underneath him that he is paying well to schedule these appointments, to locate these girls."

- f) As an example, EDWARDS filed an unsupportable and legally deficient Motion for Injunction Restraining Fraudulent Transfer of Assets, Appointment of a Receiver to Take Charge of Property of Epstein, and to Post a \$15 million Bond to Secure Potential Judgment, in Jane Doe v. Epstein, Case No. 08-CV-80893-Marra/Johnson. The motion was reported in the press as was the ultimate goal (i.e., to "pump" the cases for investor following). However, the Court found "Plaintiff's motion entirely devoid of evidence . . .", and denied the motion *in toto*.
- g) ROTHSTEIN told investors he had another 52 females that he represented, and that Epstein had offered \$200 million to resolve,

but that he could settle, confidently, these cases for \$500 million, separate and apart from his legal fees.

h) ROTHSTEIN and the Litigation Team knew or should have known that their three (3) filed cases were weak and had minimal value for the following reasons:

- (i) L.M. — testified she never had any type of sex with Epstein; worked at numerous strip clubs; is an admitted prostitute and call girl; has a history of illegal drug use (pot, painkillers, Xanax, Ecstasy); and continually asserted the 5th Amendment during her depositions in order to avoid answering relevant but problem questions for her;
- (ii) E.W. — testified she worked at eleven (11) separate strip clubs, including Cheetah which RRA represented and in which ROTHSTEIN may have owned an interest; and E.W. also worked at Platinum Showgirls in Boynton Beach, which was the subject of a recent police raid where dancers were allegedly selling prescription painkillers and drugs to customers and prostituting themselves.
- (iii) Jane Doe (federal case) seeks \$50 million from Epstein. She and her attorneys claim severe

emotional distress as a result of her having voluntarily gone to Epstein's home. She testified that there was never oral, and or sexual intercourse; nor did she ever touch his genitalia. Yet, Jane Doe suffered extreme emotional distress well prior to meeting Epstein as a result of having witnessed her father murder his girlfriend's son. She was required to give sworn testimony in that matter and has admitted that she has lied in sworn testimony. Jane Doe worked at two different strip clubs, including Platinum Showgirls in Boynton Beach.

- i) Conducted ridiculous and irrelevant discovery such as subpoenaing records from an alleged sex therapist, Dr. Leonard Bard in Massachusetts, when the alleged police report reflected that EPSTEIN had only seen a chiropractor in Palm Beach named Dr. Bard. No records relating to EPSTEIN existed for this alleged sex therapist, Dr. Bard, and the alleged subpoena for records was just another mechanism to "pump" the cases for investor appeal;
- j) Allowed a Second Amended Complaint to be filed on behalf of L.M. alleging that EPSTEIN forced the minor into "oral sex," yet L.M. testified that she never engaged in oral, anal, or vaginal

intercourse with EPSTEIN and she had never touched his genitalia.

- k) Told investors, as reported in an Associated Press article, that celebrities and other famous people had flown on EPSTEIN'S plane when assaults took place. Therefore, even though none (zero) of RRA's clients claim they flew on EPSTEIN'S planes, the Litigation Team sought pilot and plane logs. Why? Again, to prime the investment "pump" with new money without any relevance to the existing claims made by the RRA clients.
- l) After EDWARDS joined RRA, EDWARDS and former Circuit Judge William Berger filed and argued motion to make the Non-Prosecution Agreement (NPA) between Epstein and USAO public. But, RRA, EDWARDS and Berger, and their three clients, already had a copy of the NPA. They knew what it said and they knew the civil provisions in the agreement had no impact whatsoever on the three pending Civil Actions.

The concept behind certain civil provisions in the NPA was to allow an alleged victim to resolve a civil claim with Epstein, maintain her complete privacy and anonymity and move on with her life. As an assistant United States Attorney stated at a hearing in federal court, the NPA was not designed "to hand them a jackpot or a key to a bank."

43. ROTHSTEIN, with the intent and improper motive to magnify his financial gain so continue to fund the fraudulent and illegal investment and/or Ponzi scheme, had EDWARDS demand excessive money from EPSTEIN in the Civil Actions.

44. The actions described in paragraph 42 above herein had no legitimate purpose in pursuing the Civil Actions against EPSTEIN, but rather were meant to further the fraudulent scheme and criminal activity of ROTHSTEIN so that he and others could fraudulently overvalue the settlement value of the existing and non-existent claims against EPSTEIN to potential investors.

45. As a result of the fraudulent investment or (Ponzi) scheme, RRA and its attorneys in the Civil Actions against EPSTEIN may have compromised their clients' interests. ROTHSTEIN and the Litigation Team would have been unable to give unbiased legal counsel because outside investor(s) had been promised a financial interest in the outcome of the actions. Additionally, if a plaintiff received payments from investment monies while her action is pending, this clearly could impact the plaintiff's decision of whether or not to settle the current litigation or shade their testimony (i.e. commit perjury) to gain the greatest return on the investment and to further promote the Ponzi Scheme.

46. The truthfulness of L.M.'s allegations and testimony in L.M.'s state civil action have been severely compromised by the need to seek a multi-million dollar payout to help maintain RRA's massive fraud. Because fictitious settlements of tens of millions of dollars in cases relating to EPSTEIN were represented to "investors" in this Ponzi scheme, RRA and the attorneys in the Civil Actions needed to create a fiction that

Included extraordinary damages. However, the actual facts behind her action would never support such extraordinary damages. Therefore, extraordinary measures were undertaken to create an entirely inflated value of her claims against EPSTEIN.

- a. Though she held herself out as a "victim" of Epstein, she admitted to having returned over and over again to him despite her current claim of abuse. She has now admitted, under oath, to being a call girl/escort since the age of 15. (In her deposition September 24, 2009 Transcript "DT" 280:16-19). She testified "Well, I lived life as a prostitute," (see DT 156:7) and "I am a prostitute when I make money" (see DT 156:12-13). L.M. admitted her activity with men other than Epstein to making \$1,000 a day from prostitution on maybe more than 20 occasions in one year alone (DT 157:11-158:21). L.M. admitted under oath to keeping a list of amounts she collected from "Johns" in "two or three" lined books including a book of "Psalms" that she obtained from a religious store (DT 152:1-14). Under the circumstances, her claim for damages against EPSTEIN, one of L.M.'s many "Johns" during that same period, would be so incredible and certainly not likely to produce the extraordinary settlements promised to "RRA's investors."

47. In April 2007, before she was represented by EDWARDS, and RRA, L.M. gave sworn taped recorded testimony to the agents of the FBI. She was represented by a lawyer other than EDWARDS at that statement. She spoke of EPSTEIN in a very positive and friendly terms and directly contradicted the central allegations on which L.M.'s civil action against Epstein is now based. However, once in the hands of

EDWARDS and RRA, L.M.'s story changed dramatically. All of a sudden she wanted to sue EPSTEIN and like other RRA clients, sought tens of millions of dollars.

- a. For example, in her sworn statement to the FBI, L.M. was insistent that "Jeffrey is an awesome man." (p. 21 - FBI); At the conclusion of she stated: "I hope Jeffrey, nothing happens to Jeffrey because he's an awesome man and it really would be a shame. It's a shame that he has to go through this because he's an awesome guy and he didn't do nothing wrong, nothing." (pp. 57-58 - FBI). In fact, L.M. spoke so highly of EPSTEIN and her interactions with him that the US Attorney's office informed a federal court in July 2008 that the US Attorney could not consider L.M. a victim.

Yet, by September 24, 2009, the date on which L.M. began her deposition in her civil action and now represented by RRA and EDWARDS, L.M.'s new and very different tale about purported sexual misconduct under the supposed influence of EPSTEIN had been thoroughly rehearsed and her role into the ROTHSTEIN scam was complete. In her deposition in her civil action, L.M. declared that:

"I, I don't really care about money." (DT 206:8)

"He needs time in jail. He doesn't want to be -- this is not right for him to be on the streets living daily . . ." (DT 219:21-23)

"You don't think my whole life I have lived that shitty life because of Jeffrey Epstein?" (DT 222:7-8)

b. In her sworn FBI testimony (pre-EDWARDS and RRA), L.M. was emphatic that her interactions with Epstein involved no inappropriate sexual touching in any way. In fact, it was exactly the opposite:

Q: Did he at any point kiss you, touch you, show any kind of affection towards you?

A: Never, never. (p. 21 -- FBI) . . .

Q: So he never pulled you closer to him in a sexual way?

A: I wish. No, no, never, ever, ever, no, never. Jeffrey is an awesome man, no. (p. 21 - FBI)

Yet, L.M. filed her second amended complaint in April 2009, after EDWARDS joined RRA, the allegations against EPSTEIN in L.M.'s complaint became even more salacious. In paragraph 12 of L.M.'s Second Amended Complaint, L.M. alleges among other things, that:

"Jeffrey Epstein coerced, induced, or enticed . . . the then minor Plaintiff to commit various acts of sexual misconduct. These acts included, but were not limited to, fondling and inappropriate and illegal sexual touching of the then minor Plaintiff, forcing or inducing the then minor plaintiff into oral sex or other sexual misconduct..."

- c. In her sworn FBI statement (pre-EDWARDS and RRA), L.M. testified that Carolyn Andriano, the individual who first brought L.M. to EPSTEIN's home, told L.M. "make sure you're 18 because Jeffrey doesn't want any underage girls." (p. 8 - FBI).

Yet at her September, 2009 deposition now represented by EDWARDS and RRA, L.M. told a very different story:

Q: My question was what did Carolyn tell you to tell Mr. Epstein about your age?

A: She said it didn't matter.

Q: That's your recollection about what she said?

A: Yes, she said - I remember her saying it doesn't matter. Don't worry about it.

(DT 199:20-25)

- d. Pre-EDWARDS and RRA, L.M. testified to the FBI: "I always made sure - I had a fake ID, anyways saying that I was 18." (p. 8 - FBI).

Yet, when questioned about her fake ID at her September 2009 depo, she stated:

Q: And did you have a fake ID?

A: No.

Q: Have you ever had a fake ID?

A: No.

(DT 300:5-8)

e. In her FBI statement (pre-EDWARDS and RRA), L.M. testified about others L.M. brought to the Epstein home. L.M. testified that women she brought to EPSTEIN's home were eager for the opportunity and content with their experiences:

A: None of my girls ever had a problem and they'd call me. They'd beg me, you know, for us to go to Jeffrey's house because they love Jeffrey. Jeffrey is a respectful man. He really is. I mean, and he all thought we were of age always. This is what's so sad about it. (p 30 - FBI).

...

Q: Did any of the girls complain about what happened after they left there?

A: No. You asked me that question. No, everybody loved Jeffrey. (p. 44 - FBI)

...

A: Every girl that I brought to Jeffrey, they said they were fine with it. and like for example [E.W. - another of RRA's clients in the Civil Actions], a lot of girls begged me to bring them back for the money. And as far as I know, we all had fun there. (p. 45 - FBI)

Yet, with EDWARDS and RRA as her attorneys, L.M. did a "180" at her September, 2009 deposition in saying:

A: . . . Once they were there, they were scared out of their mind. They did it anyways and some of them walked out and said L.M. don't ever do this to me again. That was the worst thing that ever happened to me. (DT 170:6-11)

. . . A: And then, a lot of girls weren't comfortable. (DT 171:13)

f. The above represent only a few of the dramatic changes L.M. made in her testimony prior to her representation by EDWARDS/RRA and after she hired ROTHSTEIN, EDWARDS and RRA.

48. As a result of the fraudulent investment or (Ponzi) scheme, L.M. may knowingly have compromised her alleged interests in her Civil Action, or committed a fraud on the court.

49. RRA and the Litigation Team took an emotionally driven set of facts involving alleged innocent, unsuspecting, underage females and a Palm Beach Billionaire and sought to turn it into a gold mine. Rather than evaluating and resolving the cases based on the merits (i.e. facts) which included knowledgeable, voluntary and consensual actions by each of the claimants and substantial pre-Epstein psychological and emotional conditions of each of the claimants and substantial sexual experiences pre-Epstein, RRA and the Litigation Team sought through protective orders and objections to block relevant discovery regarding their claimants. They instead forged ahead with discovery the main purpose of which was to pressure Epstein into settling the cases.

Fortunately, their tactics have not been successful. As Magistrate Judge Linnea Johnson wrote in a discovery order dated September 15, 2009 (DE 299 in Federal Case #08-80119) in denying Plaintiffs' Motion for Protective Order:

"This is his [Epstein's] right. The Record in this case is clear that the childhood of many of the Plaintiffs was marred by instances of abuse and neglect, which in turn may have resulted, in whole or in part, in the damages claimed by the Plaintiffs."

In addition, in an Omnibus Order dated October 28, 2009 (DE 377 in Federal Case #08-80119) Magistrate Judge Linnea Johnson wrote:

"Here the request at issue goes to the very heart of the Plaintiff's damage claims, requesting not only general information relating to Plaintiff's sexual history, but inquiring as to specific instances wherein Plaintiff received compensation or consideration for sex acts, claim other males sexually assaulted, battered, or abuses her, and/or claim other males committed lewd or lascivious acts on her. As a global matter, Plaintiffs clearly and unequivocally place their sexual history in issue by their allegations that Epstein's actions in this case has negatively affected their relationships by, among other things, "distrust in men," "sexual intimacy problems," "diminished trust," "social problems," "problems in personal relationships," "feeling of stress around men," "premature teenage pregnancy," "antisocial behaviors," and "hyper-sexuality and promiscuity." Considering these allegation, there simply can be no question that Epstein is entitled to know whether Plaintiffs were molested or the subject of other "sexual activity" or "lewd

and lascivious conduct" in order to determine whether there is an alternative basis for the psychological disorders Plaintiffs claim to have sustained, whether Plaintiffs engaged in prostitution or other similar type acts and how certain acts alleged in the Complaint materially affected Plaintiffs' relationships with others or how those acts did not have such an affect on those relationships and/or whether Plaintiffs suffered from the alleged emotional and psychological disorders as a result of other sexual acts prior to the acts alleged in the Complaint. To deny Epstein this discovery, would be tantamount to barring him from mounting a defense.

50. ROTHSTEIN, EDWARDS and L.M.'s actions constitute a fraud upon EPSTEIN as RRA, ROTHSTEIN and the Litigation Team represented themselves to be acting in good faith and with the best interests of their clients in mind at all times when in reality, they were acting in furtherance of the investment or Ponzi scheme described herein. EPSTEIN justifiably relied to his detriment on the representations of RRA, and Defendants, ROTHSTEIN, EDWARDS and L.M. as to how he conducted and defended the Civil Actions brought against him.

51. As a direct and proximate result of the fraudulent and illegal investment or Ponzi scheme orchestrated by ROTHSTEIN and as yet other unknown co-conspirators and as a result of the litigation tactics undertaken by the Litigation Team and L.M. as set forth herein, Plaintiff EPSTEIN has incurred and continues to incur the monetary damages including, but not limited to, having to pay an amount in excess of the Civil Actions' true value as a result of them refusing to settle in that a percentage of any payment by

EPSTEIN may have been promised to third party investors; incurring significant additional legal fees and costs as result of Defendants refusal to conduct settlement negotiations in a forthright and good faith manner because any monies paid by EPSTEIN is in reality a promised return on an investment; and incurred significant attorneys' fees and costs in defending the discovery that was not relevant, material and/or calculated to lead to the admissibility of evidence, but which was done for the sole purpose of "pumping" the cases to investors.

52. EPSTEIN has also been injured in that the scope of the fraudulent and criminal or racketeering activity so permeated the RRA law firm that EPSTEIN has been prevented from fully and fairly defending the civil actions brought against him. In essence, the very existence of RRA was based on the continuation of the massive Ponzi scheme orchestrated by ROTHSTEIN and other co-conspirators. In order to continue to bring in monies from investors, ROTHSTEIN and other co-conspirators used the Civil Actions against EPSTEIN, along with other manufactured lawsuits, as a means of obtaining massive amounts of money.

53. ROTHSTEIN, EDWARDS and L.M. are liable for damages caused to EPSTEIN – individually, and jointly and severally.

Count I – Violation of §§72.101, et seq., Fla. Stat. –
Florida Civil Remedies for Criminal Practices Act –
Against All Defendants

54. Plaintiff realleges and incorporates paragraphs 1 through 53 as if fully set forth herein.

55. RRA, ROTHSTEIN, EDWARDS and L.M. each and collectively constitute an enterprise pursuant to §772.102(3), Fla. Stat. (2009).

56. ROTHSTEIN, EDWARDS and L.M. engaged in a pattern of criminal activity as defined in §772.102(3) and (4), Fla. Stat. (2009).

57. As alleged herein, ROTHSTEIN and EDWARDS committed multiple predicate acts in violation of §772.103(1), (2), (3) and (4), Fla. Stat., including violations of Florida Statutes - Chapter 517, relating to securities transactions; Chapter 817, relating to fraudulent practices, false pretenses, and fraud generally (which includes L.M.); Chapter 831, relating to forgery; §836.05, relating to extortion (which includes L.M.); and Chapter 837, relating to perjury (which includes L.M.). Substantially more than two predicate acts (i.e., the selling of or participation of the sale of fabricated settlements outlined herein, including the Civil Actions involving Epstein as well as the improper litigation tactics outlined above) occurred within a five-year time period.

58. As a direct and proximate result of ROTHSTEIN, EDWARDS and L.M.'s violations of §772.103, Fla. Stat., EPSTEIN has been injured.

59. Pursuant to §772.104(1), Fla. Stat., Plaintiff EPSTEIN is entitled to threefold of his actual damages sustained, reasonable attorney's fees and court costs, and such other damages as allowed by law.

WHEREFORE, Plaintiff EPSTEIN respectfully demands the entry of a judgment for damages against all the named Defendants.

Count II - Florida RICO -
"Racketeer Influenced and Corrupt Organization Act"
Pursuant to §§895.01, et seq., Fla. Stat. (2009).
Against All Defendants

60. Plaintiff realleges and incorporates paragraphs 1 through 53 as if fully set forth herein.

61. RRA, along with ROTHSTEIN, EDWARDS and L.M., each and collectively, constitute an enterprise pursuant to §895.02(3), Fla. Stat. (2009).

62. During all times relevant hereto, ROTHSTEIN, EDWARDS and L.M. were and are associated with the enterprise, RRA, and each other.

63. Defendants, ROTHSTEIN, EDWARDS and L.M., as persons associated with the enterprise, RRA and each other (as an enterprise), unlawfully conducted or participated, directly or indirectly, in such an enterprise through a pattern of racketeering, § 895.03(3), Fla. Stat., as alleged above herein.

64. The breadth and scope of ROTHSTEIN, EDWARDS and, potentially, L.M.'s racketeering activity continues to be investigated by the FBI, as numerous civil lawsuits against some of the Defendants and others continue to be filed by persons who have been damaged. As of the filing of this Complaint, criminal charges have only been brought against ROTHSTEIN.

65. Substantially more than two predicate acts (i.e., the selling of fabricated settlements outlined herein, including the Civil Actions involving Epstein as well as the improper litigation tactics outlined above) occurred within a five year time period.

66. Pursuant to §895.02, Fla. Stat., ROTHSTEIN and EDWARDS engaged in a pattern of "racketeering activity" through the commission of crimes as defined in § 895.02(1)(a)-(b), Fla. Stat., including Chapter 517, relating to securities; Chapter 817, relating to fraudulent practices, false pretenses, and fraud (including L.M.) generally;

Chapter 813, relating to forgery; §836.05, relating to extortion (including L.M.); Chapter 837, relating to perjury (including L.M.).

67. Pursuant to §895.05, Fla. Stat., Plaintiff seeks the following relief against Defendants, ROTHSTEIN, EDWARDS and L.M.:

- a) Ordering ROTHSTEIN and EDWARDS to divest themselves of any interest in the enterprise, RRA;
- b) Enjoin all Defendants from engaging in the same type of conduct and activities as described herein; and
- c) Temporarily enjoining ROTHSTEIN, EDWARDS and L.M., from the continuation of the Civil Actions brought against EPSTEIN until criminal charges have been formally brought against RRA and/or any of the Defendants, such that EPSTEIN may be allowed to evaluate whether a stay or dismissal of all Civil Actions against him is merited.

68. EPSTEIN further seeks an award of his reasonable attorney's fees and costs, and such other relief that this Court deems appropriate.

WHEREFORE, Plaintiff EPSTEIN respectfully demands the entry of a judgment for the relief sought and damages against the named Defendants.

Count III – Abuse of Process –
Against All Defendants

69. Plaintiff realleges and incorporates paragraphs 1 through 53 as if fully set forth herein.

70. After instituting the Civil Actions against EPSTEIN, the actions of Defendants, ROTHSTEIN, EDWARDS and L.M. as alleged in paragraphs 9 through 53 herein, constitute an illegal, improper or perverted use of process.

71. ROTHSTEIN, EDWARDS and L.M. possessed ulterior motives or purposes in exercising such illegal, improper, or perverted use of process.

72. As a result of ROTHSTEIN, EDWARDS and L.M.'s actions, EPSTEIN suffered damages.

WHEREFORE, Plaintiff EPSTEIN respectfully demands the entry of a judgment for damages against all the named Defendants.

Count IV – Fraud
Against All Defendants

73. Plaintiff realleges and incorporates paragraphs 1 through 53 as if fully set forth herein.

74. ROTHSTEIN, by and through Defendant EDWARDS and L.M. made false statements of fact to EPSTEIN and his attorneys and agents, known to be false at the time made, and/or intentionally concealed material information from EPSTEIN and his attorneys and agents, for the purpose of inducing EPSTEIN to act in reliance thereon.

75. EPSTEIN did so act on the misrepresentation and/or concealment by incurring additional attorney's fees, costs, and expenses in aggressively defending the civil actions whereas in reality, because the Civil Actions against Plaintiff were being exploited and over-valued so as to lure additional investors and to attempt to extort as much money as possible from EPSTEIN so as to continue the massive fraud.

WHEREFORE Plaintiff EPSTEIN demands judgment against Defendants for damages incurred and for any other relief to which he is entitled under the law.

Conspiracy to Commit Fraud
Against All Defendants

76. Plaintiff realleges and incorporates paragraphs 1 through 53, and 74 and 75 as if fully set forth herein.

77. ROTHSTEIN, EDWARDS and L.M. conspired to commit a fraud upon EPSTEIN.

78. ROTHSTEIN, EDWARDS and L.M. combined by and through concerted action as detailed herein to accomplish an unlawful purpose or accomplish some purpose by unlawful means. The unlawful purpose was, among other things, the orchestrating and continuation of the massive fraudulent Ponzi scheme and receipt of monies for the continuation of the scheme. The unlawful means includes, but is not limited to, the use of the Civil Actions against EPSTEIN in an unlawful, improper, and fraudulent manner.

79. As a direct and proximate result of ROTHSTEIN, EDWARDS and L.M.'s conspiracy to defraud EPSTEIN, EPSTEIN suffered damages.

WHEREFORE Plaintiff EPSTEIN demands judgment against Defendants for damages incurred and for any other relief to which he is entitled under the law.

Jury Trial

Plaintiff demands Jury Trial on all issues so triable.

By: 
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 09-60331-CR-COHN

UNITED STATES OF AMERICA,

Plaintiff,

v.

SCOTT W. ROTHSTEIN,

Defendant.

PLEA AGREEMENT

The United States of America and SCOTT W. ROTHSTEIN (hereinafter referred to as "the defendant") enter into the following agreement:

1. The defendant agrees to plead guilty to the five count Information, which charges the defendant in Count 1 with a Racketeering Conspiracy, in violation of Title 18, United States Code, Section 1962(d); in Count 2 with Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Section 1956(h); in Count 3 with Conspiracy to Commit Mail Fraud and Wire Fraud, in violation of Title 18, United States Code, Section 1349; and in Counts 4 and 5 with Wire Fraud, in violation of Title 18, United States Code, Section 1343.

2. The defendant is aware that the sentence will be imposed by the Court after considering the Federal Sentencing Guidelines and Policy Statements (hereinafter "the Sentencing Guidelines") in an advisory capacity. The defendant acknowledges and understands that the Court will compute an advisory sentence under the Sentencing Guidelines and that the applicable advisory guidelines will be determined by the Court relying in part on the results of a Pre-Sentence Investigation by the Court's probation office, which investigation will commence after the guilty plea

has been entered. The defendant is also aware that, under certain circumstances, the Court may depart from the applicable advisory guideline range and impose a sentence that is either more severe or less severe than the advisory guidelines range. The Court is permitted to tailor the ultimate sentence in light of other statutory concerns. Knowing these facts, the defendant understands and acknowledges that the Court has the authority to impose any sentence within and up to the statutory maximum authorized by law for the offenses identified in paragraph 1 and that the defendant may not withdraw the plea solely as a result of the sentence imposed.

3. The defendant also understands and acknowledges that the Court may impose a statutory maximum term of imprisonment of up to twenty years for each of the offenses set forth in Counts 1 through 5, for a total of up to one hundred years, followed by a term of up to three years of supervised release for each offense. In addition to a term of imprisonment and supervised release, the Court may impose a fine of up to \$250,000.00 with respect to the offenses set forth in Counts 1, 3, 4, and 5, and may impose a fine with respect to the offense set forth in Count 2 of the greater of \$500,000.00 or twice the value of the property involved in the money laundering transactions.

4. The defendant further understands and acknowledges that, in addition to any sentence imposed under paragraph 3 of this agreement, a special assessment in the amount of \$100.00 with respect to each of the offenses set forth in counts 1 through 5, for a total of \$500.00, will be imposed on the defendant, which will be paid by the defendant at the time of entry of this plea.

5. The defendant further understands and acknowledges that, in addition to any sentence imposed under paragraphs 3 and 4 of this agreement, that restitution may be imposed as part of that sentence. The defendant agrees that for purposes of triggering the mandatory restitution provisions of Title 18, United States Code, Section 3663A, the offenses to which the defendant is pleading

guilty under this agreement in this case are “offenses against property” and were “committed by fraud and deceit,” as those terms are understood within Title 18, United States Code, Section 3663A(c)(1)(A)(ii). The defendant accordingly understands and acknowledges that as a result of his plea of guilty pursuant to the terms of the plea agreement in this case the Court may order that he pay restitution pursuant to the provisions of Title 18, United States Code, Sections 3663A and 3664. Promptly following the entry of his guilty plea, the defendant agrees to take all necessary steps to make the following property available, as partial satisfaction of any restitution order entered in this case: (a) all property subject to the post-Information Protective Order in this matter; and (b) all property identified in the Bill of Particulars for Forfeiture.

6. The defendant further understands and acknowledges that, in addition to any sentence imposed under paragraphs 3, 4 and 5 of this agreement, forfeiture may be imposed as part of that sentence. The defendant agrees to the forfeiture of all of his right, title and interest to all assets listed in the Information and listed in the Bill of Particulars, and/or their substitutes (hereinafter “the assets”), whether controlled individually or through defendant’s wholly owned or partially owned corporations or third-parties, which are subject to forfeiture pursuant to Title 18, United States Code, Sections 1963, 982(a)(1) and/or 981(a)(1)(C). The defendant agrees to assist the United States in achieving forfeiture of the assets and agrees to assist the United States with forfeiture of same, such assistance to include truthful testimony, especially to the extent that the assets are in the names of corporations or other entities or individuals. The defendant knowingly and voluntarily waives any right to a jury trial or any other adversarial proceeding regarding the assets and waives any notification about forfeiture proceedings, whether administrative or judicial. The defendant further waives any statute of limitations with respect to the commencement of such forfeiture proceedings,

e or judicial. The defendant also waives any defenses to the forfeiture, excessive fine or penalty under the Eighth Amendment. The defendant also appeal of the forfeiture. The defendant further acknowledges that the property in whole or in part, be used to satisfy any obligation the defendant may have for local taxes, interest and/or other penalties which may now exist or which ce.

Office of the United States Attorney for the Southern District of Florida (hereinafter "this Office") reserves the right to inform the Court and the probation office of all facts concerning the sentencing process, including all relevant information concerning the offenses charged or not, as well as concerning the defendant and the defendant's only to the express terms of any agreed-upon sentencing recommendations. In this agreement, this Office further reserves the right to make any recommendation as to the quantity of punishment.

The United States agrees that it will recommend at sentencing that the Court reduce the advisory sentencing guideline level applicable to the defendant's offense, pursuant to the Sentencing Guidelines, based upon the defendant's recognition and acceptance of personal responsibility. However, the United States will not make a sentencing recommendation if the defendant: (1) fails or refuses to make complete disclosure to the probation office of the circumstances surrounding the offense; (2) is found to have misrepresented facts to the government prior to entering this plea agreement; or (3) commits any misconduct after entering into this plea agreement,

whether administrative or judicial, including any claim of double jeopardy. The defendant agrees to waive any appeal of the forfeiture. The defendant further acknowledges that the property in whole or in part, be used to satisfy any obligation the defendant may have for local taxes, interest and/or other penalties which may now exist or which ce.

7. The Office of the United States Attorney for the Southern District of Florida (hereinafter "this Office") reserves the right to inform the Court and the probation office of all facts concerning the sentencing process, including all relevant information concerning the offenses charged or not, as well as concerning the defendant and the defendant's only to the express terms of any agreed-upon sentencing recommendations. In this agreement, this Office further reserves the right to make any recommendation as to the quantity of punishment.

8. The United States agrees that it will recommend at sentencing that the Court reduce the advisory sentencing guideline level applicable to the defendant's offense, pursuant to the Sentencing Guidelines, based upon the defendant's recognition and acceptance of personal responsibility. However, the United States will not make a sentencing recommendation if the defendant: (1) fails or refuses to make complete disclosure to the probation office of the circumstances surrounding the offense; (2) is found to have misrepresented facts to the government prior to entering this plea agreement; or (3) commits any misconduct after entering into this plea agreement,

including but not limited to committing a state or federal offense or making false statements or misrepresentations to any governmental entity or official.

9. The defendant is aware that the sentence has not yet been determined by the Court. The defendant also is aware that any estimate of the probable sentencing range or sentence that the defendant may receive, whether that estimate comes from the defendant's attorney, the government, or the probation office, is a prediction, not a promise, and is not binding on the government, the probation office or the Court. The defendant understands further that any recommendation that the government makes to the Court as to sentencing, whether pursuant to this agreement or otherwise, is not binding on the Court and the Court may disregard the recommendation in its entirety. The defendant understands and acknowledges, as previously acknowledged in paragraph 2 above, that the defendant may not withdraw his plea based upon the Court's decision not to accept a sentencing recommendation made by the defendant, the government, or a recommendation made jointly by both the defendant and the government.

10. In the event that the applicable offense level is deemed by the Court to be 43 or above (life), the government agrees to not oppose a variance; however, the Government reserves the right to oppose any sentence recommended by the defendant.

11. This agreement resolves the defendant's federal criminal liability in the Southern District of Florida growing out of any criminal conduct by the defendant known to the United States Attorney's Office for the Southern District of Florida as of the date of this plea agreement. Said provision does not prohibit potential prosecution for any acts of violence presently unknown to the United States.

12. The United States agrees that it will not oppose defendant's request that the Court recommend to the Bureau of Prisons that the defendant be designated to the lowest security level facility deemed appropriate by the Bureau of Prisons.

13. The defendant is aware that Title 18, United States Code, Section 3742 affords the defendant the right to appeal the sentence imposed in this case. Acknowledging this, and in exchange for the undertakings made by the United States in this plea agreement, the defendant hereby waives all rights conferred by Section 3742 to appeal any sentence imposed, including any restitution order, or to appeal the manner in which the sentence was imposed, unless the sentence exceeds the maximum permitted by statute or is the result of an upward departure and/or a variance from the guideline range that the court establishes at sentencing. The defendant further understands that nothing in this agreement shall affect the government's right and/or duty to appeal as set forth in Title 18, United States Code, Section 3742(b). However, if the United States appeals the defendant's sentence pursuant to Section 3742(b), the defendant shall be released from the above waiver of appellate rights. By signing this agreement, the defendant acknowledges that he has discussed the appeal waiver set forth in this agreement with his attorney. The defendant further agrees, together with the United States, to request that the district court enter a specific finding that the defendant's waiver of his right to appeal the sentence to be imposed in this case was knowing and voluntary.

14. The defendant further waives any right to file any motion or make any claim, whether under 28 U.S.C. §§2255, 2254, 2241, or any other provision of law, to collaterally attack his conviction, his sentence, or the manner in which sentence was imposed, unless the sentence exceeds the maximum permitted by statute.

15. The defendant confirms that he is guilty of the offenses to which he is pleading guilty; that his decision to plead guilty is the decision that he has made; and that nobody has forced, threatened, or coerced him into pleading guilty. The defendant affirms that he has discussed the matter of pleading guilty in the above-referenced cases thoroughly with his attorney. The defendant further affirms that his discussions with his attorney have included discussion of possible defenses that he may raise if the case were to go to trial, as well as possible issues and arguments that he may raise at sentencing. The defendant additionally affirms that he is satisfied with the representation provided by his attorney. The defendant accordingly affirms that he is entering into this agreement knowingly, voluntarily, and intelligently, and with the benefit of full, complete, and effective assistance by his attorney. The defendant accordingly agrees that by entering into this agreement he

waives any right to file any motion or make any claim, whether under 28 U.S.C. §§2255, 2254, 2241, or any other provision of law, that contests the effectiveness of counsel's representation up to the time of the entry of his guilty plea.

16. This is the entire agreement and understanding between the United States and the defendant. There are no other agreements, promises, representations, or understandings, unless contained in a letter from the United States Attorney's Office executed by all parties and counsel prior to the change of plea.

JEFFREY H. SLOMAN
UNITED STATES ATTORNEY

Date: 1/25/10


PAUL F. SCHWARTZ
ASSISTANT UNITED STATES ATTORNEY

Date: 1/25/10


JEFFREY N. KAPLAN
ASSISTANT UNITED STATES ATTORNEY

Date: 25 Jan 10


LAWRENCE D. LAVECCHIO
ASSISTANT UNITED STATES ATTORNEY

Date: 1/25/10


MARC NURIK
ATTORNEY FOR DEFENDANT

Date: 1/25/10


SCOTT W. ROTHSTEIN
DEFENDANT

STATEMENT OF FACTS

The United States of America and SCOTT W. ROTHSTEIN enter into the following stipulated statement of facts in support of the defendant's plea of guilty:

Had this case proceeded to trial, the government would have presented evidence which would have established beyond a reasonable doubt that from in or about 2005, through in or about November 2009, Defendant ROTHSTEIN conspired with persons known and unknown to the United States Attorney, to use the law firm, Rothstein, Rosenfeldt and Adler P.A. (hereinafter referred to as "RRA") as a criminal Enterprise in order to conduct a pattern of racketeering activity. Such pattern of racketeering activity included criminal acts which violated mail fraud, wire fraud, money laundering and conspiracy statutes.

The government would have presented evidence at trial which would have involved witness testimony and documentary and electronic evidence seized pursuant to a search warrant. The government's trial evidence would have established the following:

Defendant ROTHSTEIN was an attorney admitted to practice law in Florida. He was the Chief Executive Officer and Chairman of RRA. In or about 2005, Defendant ROTHSTEIN and other co-conspirators initiated a scheme to generate criminal proceeds through fraudulent acts. Defendant ROTHSTEIN induced investors through the use of false statements to loan money to himself and fictitious borrowers in return for promissory notes. He solicited bridge loans on behalf of purported clients of RRA, that is, he would falsely inform individuals that clients of RRA desired to borrow funds for undisclosed business deals and in return would agree to pay high rates of interest. Defendant ROTHSTEIN was aware that no such clients or requests for business financing actually existed.

Defendant ROTHSTEIN and co-conspirators also solicited investors to purchase purported

confidential settlement agreements. Such settlement agreements were falsely presented as having been reached between putative defendants based upon claims of sexual harassment and/or whistleblower actions. The investors were falsely informed that such settlement agreements were pre-litigation and therefore there was no pending litigation or court oversight. Defendant ROTHSTEIN and other co-conspirators relied upon the purported success of RRA, the existence of actual RRA civil matters and his standing in the community to lure potential investors in order to convince them to make such investments. The investors were falsely informed that the confidential settlement agreements were available for purchase. The purported settlements were allegedly available in amounts ranging from hundreds of thousands of dollars to millions of dollars and could be purchased at a discount and repaid to the investors at face value over time. For instance, in or about late 2009, a potential investor was solicited by Defendant ROTHSTEIN and/or co-conspirators to purchase a purported settlement in the amount of \$450,000. The settlement was alleged to be paid to the purported plaintiff in three installments of \$150,000 each, over the course of three months. The payment schedule was alleged to insure the confidentiality of the settlement. The purported plaintiff allegedly had agreed to accept an immediate payment of \$375,000 in satisfaction of the settlement agreement. In order to facilitate the scheme, the investor received a fraudulent settlement agreement which set forth the terms of the civil settlement, but the names of the purported plaintiff and defendant were excised due to the alleged confidentiality of the settlement.

The government would further establish that in order to facilitate and perpetrate the scheme, Defendant ROTHSTEIN and co-conspirators created false and fraudulent settlement agreements, bank statements, assignments of settlement agreements, sale and transfer agreements and personal guarantees, among other documents.

Defendant ROTHSTEIN and other co-conspirators falsely informed investors that the purported confidential settlements were either negotiated on behalf of clients of RRA or had been referred by other law firms. The investors were falsely informed that the purported settlements were based upon sexual harassment and/or whistle-blower (qui-tam) actions against corporate defendants.

Defendant ROTHSTEIN and other co-conspirators established and maintained trust accounts at several financial institutions in order to receive the investor funds and to give the appearance of legitimacy and security. False and fictitious trust account bank balance statements were created along with purported "lock letters." Such letters allegedly reflected that the funds in the trust accounts would be disbursed only to specific investors. Instead funds were disbursed among and between the various trust accounts and elsewhere by interstate wire transfers and other means in order to facilitate, promote and conceal the fraud, to launder the proceeds derived therefrom, and to enrich ROTHSTEIN and his co-conspirators. ROTHSTEIN and his co-conspirators created fraudulent on-line banking documents to further mislead investors and to facilitate the fraud.

Defendant ROTHSTEIN and co-conspirators also initiated and conducted a separate scheme to defraud clients of RRA in order to perpetuate the "Ponzi" scheme. Such clients had retained RRA to institute and file a civil lawsuit. Unknown to the clients, RRA settled the lawsuit and had obligated the clients to pay \$500,000 to the defendant. In order to perpetrate the fraud and deceive the clients, defendant ROTHSTEIN created a false and fraudulent court order purportedly signed by a Federal District Court Judge which falsely alleged that the clients of RRA had prevailed in the lawsuit and were owed a judgement of approximately \$23 million. The fraudulent court order also falsely stated that the defendant had transferred funds to the Cayman Islands for the purpose of secreting the assets.

Defendant ROTHSTEIN and other co-conspirators falsely advised the clients on several occasions that in order to recover the defendant's funds, they had to post bonds to be held in the RRA trust account. Defendant ROTHSTEIN and other co-conspirators fraudulently caused the clients to wire transfer a total of approximately \$57 million over several years to a trust account controlled by defendant ROTHSTEIN, purportedly to satisfy the bonds. Defendant ROTHSTEIN and other co-conspirators were questioned by the clients as to the progress of the alleged lawsuit. In order to delay the return of funds to the clients, defendant ROTHSTEIN fraudulently created a false Federal court order purportedly issued by a United States Magistrate Judge ordering RRA to return the transmitted funds by a later date.

Defendant ROTHSTEIN and other co-conspirators utilized funds obtained through the "Ponzi" scheme to supplement and support the operation and activities of RRA, to expand RRA by the hiring of additional attorneys and support staff, to fund salaries and bonuses, and to acquire larger and more elaborate office space and equipment in order to promote the ongoing scheme and to enrich the personal wealth of persons employed by and associated with RRA.

Defendant ROTHSTEIN and other co-conspirators engaged in the below described conduct in order to facilitate the activities of the Enterprise and to conceal and promote the scheme to defraud investors.

Defendant ROTHSTEIN and other co-conspirators utilized funds illegally obtained through the "Ponzi" scheme to make political contributions to local, state and federal political candidates, in a manner designed to conceal the true source of such funds and to circumvent state and federal laws governing the limitations and contribution of such funds.

Defendant ROTHSTEIN and other co-conspirators distributed lavish gifts, including exotic cars, jewelry, boats, loans, cash and bonuses, to individuals and to members of RRA in order to engender goodwill and loyalty and to create the appearance of a successful law firm.

Defendant ROTHSTEIN and other co-conspirators made large charitable contributions to public and private charitable institutions, including hospitals and other legitimate charitable and nonprofit organizations, using funds derived from the "Ponzi" scheme. "Ponzi" scheme funds were also used to provide gratuities to high-ranking members of police agencies in order to curry favor with such police personnel and to deflect law enforcement scrutiny of RRA.

Defendant ROTHSTEIN and other co-conspirators utilized funds obtained through the "Ponzi" scheme in order to purchase controlling interests in restaurants located in the Southern District of Florida. Such restaurants were used in part as a mechanism to give gratuities to individuals, including politicians, business associates and attorneys, in order to foster goodwill and loyalty, as locations to solicit potential investors and as secure locations for conspiratorial meetings.

Defendant ROTHSTEIN and other co-conspirators associated with well known politicians, in public forums and elsewhere, in order to gain greater notoriety and to create the appearance of wealth and legitimacy. Such acts were calculated in part to enhance defendant ROTHSTEIN and other co-conspirators' ability to solicit potential investors in the "Ponzi" scheme.

Defendant ROTHSTEIN and other co-conspirators used funds derived from the "Ponzi" scheme to maintain the appearance of affluence and wealth, by purchasing expensive real and personal property, in order to convince potential investors of the legitimacy of RRA and of the purported investment opportunities. Defendant ROTHSTEIN purchased expensive real property, personal property, business interests, vessels, vehicles and other indicia of success and wealth.

The government's evidence would establish that Defendant ROTHSTEIN and co-conspirators, through the use of RRA as the criminal Enterprise, knowingly and intentionally engaged in the above-described pattern of racketeering activity in order to generate proceeds for their enrichment through various criminal activities, including mail fraud, wire fraud and money laundering. The government's evidence would establish that the activities of the Enterprise affected interstate commerce through the transmission of funds among and between financial institutions and across state boundaries, among other means.

The Enterprise maintained offices in Broward County, Florida, and elsewhere and the pattern of racketeering activity emanated from the Southern District of Florida. Investors were solicited through wire and mail transmissions through the United States and elsewhere. In order to further the fraud scheme, Defendant ROTHSTEIN and other co-conspirators caused to be transmitted wire communications, in interstate and foreign commerce, including an interstate wire transfer sent from TD Bank to Gibraltar Bank on or about December 2, 2008 and an interstate wire transfer sent to TD Bank from JP Morgan Chase on or about October 16, 2009. The proceeds derived from the "Ponzi" scheme were laundered through the accounts maintained at several financial institutions in order to promote, carry on and conceal the criminal activities of RRA.

Had the forfeiture portion of the case proceeded to trial, the government would have established, at least by a preponderance of the evidence, the standard of proof required for sentencing, that the properties listed for forfeiture in the forfeiture allegations of the Information and in the Bill of Particulars for Forfeiture, were properly sought for forfeiture because the defendant acquired or maintained an interest therein or were derived from proceeds obtained directly and indirectly through the commission of the above-described racketeering activity. The government would have further established that the properties were involved in and/or were traceable to the

money laundering activity described above, and that such properties were also the proceeds of, or were derived from, the mail and wire fraud activity described above.

The undersigned hereby stipulate and agree that the aforesaid facts are true and correct and that they encompass all of the necessary elements to establish the guilt of the defendant to the charges of Conspiracy to Violate the RICO Act, in violation of Title 18, United States Code, Section 1962(d); Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Section 1956(h); Conspiracy to Commit Mail Fraud and Wire Fraud, in violation of Title 18, United States Code, Section 1349; and Wire Fraud, in violation of Title 18, United States Code, Section 1343.

JEFFREY H. SLOMAN
UNITED STATES ATTORNEY

Date: 1/25/10


PAUL F. SCHWARTZ
ASSISTANT UNITED STATES ATTORNEY

Date: 1/25/10


JEFFREY N. KAPLAN
ASSISTANT UNITED STATES ATTORNEY

Date: 25 Jan 10


LAWRENCE D. LAVECCHIO
ASSISTANT UNITED STATES ATTORNEY

Date: 1/25/10


MARC NIRIK
ATTORNEY FOR DEFENDANT

Date: 1/25/10


SCOTT W. ROTHSTEIN
DEFENDANT

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION
www.flsb.uscourts.gov

IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.

PRIVILEGE LOG
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS &
LEHRMAN

Dated: February 23, 2011

Total of 159 pages

EXHIBIT Q

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
08076-08089	08/04/2009	Bradley Edwards	Spencer Kuvin	Transcript of Alfredo Rodriguez Deposition	Joint W/P Priv.
08311-08318	05/26/2009	Bradley Edwards	Katherine Ezell	WPB-Confidential-General-Financial Disclosure/Discovery	Joint W/P Priv.
08319-08324	10/16/2009	Bradley Edwards	Amy Ederi	WPB-General-Confidential	Joint W/P Priv.
08398	09/01/2009	Bradley Edwards	Kikka Claudio	C.M.A. vs. Epstein, et al.(File#:281849)	Joint W/P Priv.
08402	09/17/2009	Bradley Edwards	Paul Cassell	Report this as a parole violation	Joint W/P Priv.
08415	09/16/2009	Bradley Edwards	Margaret Berk	Scanned document from Margaret Berk	Joint W/P Priv.
08422	08/11/2009	Bradley Edwards	Katherine Ezell	Subpoena directed to the investigators	Joint W/P Priv.
10060	08/03/2009	Adam Horowitz	Jacque Johnson	Epstein-Depo-New York	Joint W/P Priv.
10069-10074	08/04/2009	Bradley Edwards	Spencer Kuvin	RE:Transcript of Alfredo Rodriguez Deposition	Joint W/P Priv.
10077-10079	08/06/2009	Bradley Edwards	Mercedes Estrada	RE:Epstein vs. Jane Doe No.101 & Epstein vs. Jane doe No. 102	Joint W/P Priv.
10099-10102	08/27/2009	Bradley Edwards	Spencer Kuvin	RE: Epstein Depo	Joint W/P Priv.
10192	08/11/2009	Adam Horowitz	Jacque Johnson	Trump Depo moved 08/18 to 9/24 in NY	Joint W/P Priv.
10194-10195	08/11/2009	Jacque Johnson	Kikka Claudio	FW: Out of state subpoenas	Joint W/P Priv.
10264-10266	08/09/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Letter regarding Leslie Wexner	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
10279-10291	08/10/2009	Adam Horowitz	Jacque Johnson	RE: Epstein-Notice of production from non parties/depo of Jane Doe	Joint W/P Priv.
10372-10373	09/17/2009	Bradley Edwards	Katherine Ezell	RE: Leslie Wexner	Joint W/P Priv.
10490-10493	09/21/2009	Bradley Edwards	Amy Ederi	FW: Epstein Depo	Joint W/P Priv.
10592-10593	09/29/2009	Bradley Edwards	Katherine Ezell	RE: Leslie Wexner	Joint W/P Priv.
10604-10620	10/01/2009	Bradley Edwards	Katherine Ezell	FW:meeting w/ atty fr wexner	Joint W/P Priv.
10639-10643	10/06/2009	Bradley Edwards	Stuart Mermelstein	Meeting w/Leslie Wexner	Joint W/P Priv.
10700-10702	10/13/2009	Adam Horowitz	Jacque Johnson	Depo	Joint W/P Priv.
10724-1073	10/14/2009	Adam Horowitz	Jacque Johnson	Epstein-depo of Alan Dershowitz	Joint W/P Priv.
10897	10/29/2009	Bradley Edwards	Stuart Mermelstein	Leslie Wexner	Joint W/P Priv.
10992-11005	06/22/2009	Bradley Edwards	Amy Ederi	RE:Regular Monthly Cong. Call	Joint W/P Priv.
11011-11021	06/23/2009	Bradley Edwards	Katherine Ezell	RE:Regular Monthly Cong. Call	Joint W/P Priv.
11026-11032	07/09/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein commissioner appointees	Joint W/P Priv.
11072-11074	07/28/2009	Bradley Edwards	Katherine Ezell	Possible witness from Switzerland	Joint W/P Priv.
11166-11169	06/23/2009	Katherine Ezell	Bradley Edwards	RE:Article: Bear Stearns	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
11240-11245	06/22/2009	Katherine Ezell	Bradley Edwards	Article: Bear Stearns	Joint W/P Priv.
11248-11250	06/22/2009	Amy Ederi	Bradley Edwards	Article: Bear Stearns	Joint W/P Priv.
11255-11259	06/23/2009	Katherine Ezell	Bradley Edwards	USAO Chose Bradley Edwards conversation	Joint W/P Priv.
11269-11281	06/30/2009	Stuart Mermelstein	Bradley Edwards	RE: Epstein Depo; possible deponents	Joint W/P Priv.
11316-11319	06/28/2009	Katherine Ezell	Bradley Edwards	Discussion about possible witness from Switzerland	Joint W/P Priv.
11332-11336	08/04/2009	Spencer Kuvin	Bradley Edwards	FW: Transcript of Alfredo Rodriguez Depo and Copperfeild and Clinton's whereabouts	Joint W/P Priv.
11340-11341	08/05/2009	Mercedes Estrada	Bradley Edwards	RE: Epstein vs. Jane Doe No. 101 & 102	Joint W/P Priv.
11348-11358	08/06/2009	Adam Horowitz	Bradley Edwards	RE: Motion for protective order/discussion	Joint W/P Priv.
11430-11434	08/27/2009	Spencer Kuvin	Bradley Edwards	Discussion RE: Wexner involvement	Joint W/P Priv.
11443	09/17/2009	Katherine Ezell	Bradley Edwards	Wexner served subpoena OH	Joint W/P Priv.
11541-11542	09/29/2009	Katherine Ezell	Bradley Edwards	RE: Leslie Wexner & Bob	Joint W/P Priv.
11551-11559	10/01/2009	Spencer Kuvin	Bradley Edwards	RE: Meeting w. Stanelly Arkin	Joint W/P Priv.
11585-11586	10/14/2009	Adam Horowitz	Bradley Edwards	RE: Epstein; Larry Visoski confirmed	Joint W/P Priv.
11675-11676	10/29/2009	Stuart Mermelstein	Bradley Edwards	RE: Leslie Wexner attorney info	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15981-15988	08/04/2009	Spencer Kuvin	Jacque Johnson	Attachment:Kellen & Trump subpoena	Joint W/P Priv.
15999-16007	08/05/2009	Bert Patton	Jacque Johnson	RE:Epstein Depo-New York	Joint W/P Priv.
16057-16065	08/06/2009	Mercedes Estrada	Jacque Johnson	Trump and Maxwell Dep dates	Joint W/P Priv.
15918-15949	08/04/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo's 08/14,17,18 in NY & OH	Joint W/P Priv.
16066-16069	08/06/2009	Adam Horowitz	Jacque Johnson	Maxwell, Trump, Wexner convo RE:Depo dates	Joint W/P Priv.
16095-16098	08/11/2009	Adam Horowitz	Jacque Johnson	Maxwell, Trumo, Wexner Convo RE:Depo dates cont..	Joint W/P Priv.
15813-15814	10/29/2009	Stuart Mermelstein	Bradley Edwards	Wexler Lawyer's info	Joint W/P Priv.
15856	08/03/2009	Adam Horowitz	Jacque Johnson	Epstein Depo-NY;2 Attachments	Joint W/P Priv.
15866-15881	08/03/2009	Adam Horowitz	Jacque Johnson	Epstein Depos 08/14,17,18 in NY&OH/PDF of Sarah Kellen Notice of Videotaped Depo	Joint W/P Priv.
15893-15901	08/03/2009	Kikka Claudio	Jacque Johnson	Depo & subpoena notice for Trump	Joint W/P Priv.
15360-15363	09/01/2009	Jacque Johnson	Mercedes Estrada	RE:Alan Dershowitz;Harvard Law Info	Joint W/P Priv.
15394-15397	09/09/2009	Jacque Johnson	Katherine Ezell	RE:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
15413-15428	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
15434-15437	09/10/2009	Jacque Johnson	Katherine Ezell	Notice Of Production from Non-Parties discussion	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15454-15475	09/15/2009	Adam Horowitz	Jacque Johnson	Critton's notice of depo; Epstein notice of hearing, Mark Epstein notice of depo	Joint W/P Priv.
01465	07/13/2009	Katherine Ezell	Bradley Edwards	Epstein	Joint W/P Priv.
15485-15492	09/17/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein Depo	Joint W/P Priv.
15493-15500	09/18/2009	Jacque Johnson	Katherine Ezell	RE: Deposition of Jean Luc Bruhnel	Joint W/P Priv.
15501-15555	09/18/2009	Jacque Johnson	Adam Horowitz	RE: Epstein Depo	Joint W/P Priv.
15556-15564	09/22/2009	Jacque Johnson	Margaret Berk	Epstein Depos	Joint W/P Priv.
15565-15575	09/25/2009	Jacque Johnson	Lisa Rivera	FW: Deposition of Jean Luc Bruhnel	Joint W/P Priv.
15687-15688	10/01/2009	Jacque Johnson	Lisa Rivera	Depo of David Hart Rogers	Joint W/P Priv.
15692-15707	10/01/2009	Jacque Johnson	Katherine Ezell	FW: Meeting w/ Stanley Arkin	Joint W/P Priv.
15708-15709	10/06/2009	Jacque Johnson	Mercedes Estrada	RE: Jane Does 2-8v. Epstein-Cross Nod's of Oct 6-8 depositions	Joint W/P Priv.
15033-15032	08/05/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein-Depo for 8/17	Joint W/P Priv.
15087-15093	08/06/2009	Jacque Johnson	Mercedes Estrada	RE: Epstein-Depo for 8/17	Joint W/P Priv.
15094-15100	08/06/2009	Jacque Johnson	Kikka Claudio	RE: Epstein Depo-New York	Joint W/P Priv.
15109-15112	08/10/2009	Jacque Johnson	Adam Horowitz	RE: Epstein Depositions for 8/14, 17, 18 in NY & OH	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
15122-15125	08/11/2009	Jacquie Johnson	Kikka Claudio	RE: Ms. Maxwell Depo rescheduled	Joint W/P Priv.
15142-15158	08/11/2209	Bradley Edwards	Kikka Claudio	FW:out of state subpoenas	Joint W/P Priv.
15166-15170	08/11/2009	Jacquie Johnson	Kikka Claudio	RE:out of state subpoenas	Joint W/P Priv.
15171-15172	08/11/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15178-15182	08/12/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein	Joint W/P Priv.
15306-15355	08/25/2009	Jacquie Johnson	Kikka Claudio	FW:Epstein Depo Notices & Subs	Joint W/P Priv.
14951-14952	08/03/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14954-14972	09/16/2009	Adam Horowitz	Jacquie Johnson	RE:Epstein-Depo of Mark Epstein on 9/21 in NY will take place as scheduled	Joint W/P Priv.
14979-14981	08/03/2009	Jacquie Johnson	Kikka Claudio	RE:Epstein Depo-New York	Joint W/P Priv.
14983-15015	08/04/2009	Jacquie Johnson	Adam Horowitz	RE:Epstein Depositions 8/14.17, &18 in NY & OH	Joint W/P Priv.
16501-16519	09/15/2009	Adam Horowitz	Jacquie Johnson	Epstein Hearing	Joint W/P Priv.
16520-16547	09/09/2009	Spencer Kuvin	Jacquie Johnson	RE:Epstein-Deposition of Jane Doe-9/30/2009	Joint W/P Priv.
16355-16384	08/24/2009	Adam Horowitz	Jacquie Johnson	Epstein Depo Notices and Subs	Joint W/P Priv.
16554-16568	09/16/2009	Kikka Claudio	Jacquie Johnson	RE:Epstein Depo	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16574-16577	09/17/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo	Joint W/P Priv.
16396-16398	09/01/2009	Margaret Estrada	Jacque Johnson	Alan Dershowitz	Joint W/P Priv.
16578-16581	09/17/2009	Katherine Ezell	Jacque Johnson	RE:Depo	Joint W/P Priv.
16582-16585	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Deposition of Jean Luc Bruhnel	Joint W/P Priv.
16585-16611	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo	Joint W/P Priv.
16612-16439	09/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Depo of Mark Epstein	Joint W/P Priv.
16440	08/18/2009	Spencer Kuvin	Jacque Johnson	RE:Epstein Sub to Bear Stearn	Joint W/P Priv.
16740-16753	09/22/2009	Margaret Berk	Jacque Johnson	RE:Epstein Depos	Joint W/P Priv.
16443-16452	09/09/2009	Katherine Ezell	Jacque Johnson	RE:Epstein-Depos of Marcinkova & Sarah Keller	Joint W/P Priv.
16777-16786	09/30/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
16793-16794	10/01/2009	Lisa Rivera	Jacque Johnson	RE:Depo of David Hart Rogers	Joint W/P Priv.
16462-16477	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
16802-16823	10/02/2009	Margaret Berk	Jacque Johnson	RE:Epstein depos	Joint W/P Priv.
16483-16486	09/10/2009	Katherine Ezell	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
16874-16880	10/13/2009	Adam Horowitz	Jacque Johnson	Depo	Joint W/P Priv.
16904-16905	10/14/2009	Spencer Kuvin	Jacque Johnson	RE:Epstein	Joint W/P Priv.
16945	10/26/2009	Kikka Claudio	Jacque Johnson	RE:Epstein depositions on 10/28	Joint W/P Priv.
17033-17034	10/26/2009	Kikka Claudio	Jacque Johnson	RE:Epstein depositions on 10/28	Joint W/P Priv.
02065-02068	06/08/2009	Bradley Edwards	Mercedes Estrada	FW:Epstein-Confirming AT&T Dial Telephone Conference for Mon 6/8/09 at 2:00 p.m.	Joint W/P Priv.
02070	09/02/2009	Jacque Johnson	Spencer Kuvin	FW:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
02071	08/18/2009	Adam Horowitz	Jacque Johnson	RE:Epstein Sub to Bear Sterns	Joint W/P Priv.
02072-02078	09/04/2009	Jacque Johnson	Spencer Kuvin	FW:Epstein-Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
03466-03468	05/14/2009	Spencer Kuvin	Bradley Edwards	RE:Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order on Motion to Stay	Joint W/P Priv.
02301-02302	09/09/2009	Paul Cassel	Bradley Edwards	FW:Epstein	Joint W/P Priv.
03122-03123	06/10/2009	Adam Horowitz	Bradley Edwards	FW: Motion to Dismiss	Joint W/P Priv.
02805-02806	05/26/2009	Susan Stirling	Katherine Ezell	RE:WPB-Confidential-Genereal-Financial Disclosure/Discovery	Joint W/P Priv.
02670-02671	10/21/2009	Bradley Edwards	Spencer Kuvin	FW:Subpoena Info	Joint W/P Priv.
02517-02519	10/02/2009	Bradley Edwards	Katherine Ezell	FW:Meeting w/Stamley Arkin	Joint W/P Priv.

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Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman

BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
02614-02617	08/05/2009	Bradley Edwards	Kikka Claudio	FW:Proposal Request	Joint W/P Priv.
15702-15704	10/02/2009	Bradley Edwards	Katherine Ezell	FW:Meeting w/Stamley Arkin	Joint W/P Priv.
15581-15585	09/28/2009	Bradley Edwards	Amy Ederi	FW:Epstein Depo	Joint W/P Priv.
15431-15433	09/10/2009	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
15797-15798	10/14/2009	Spencer Kuvin	Bradley Edwards	RE:Epstein	Joint W/P Priv.
11560-11562	10/02/2009	Bradley Edwards	Katherine Jacque Johnson	FW:Meeting w/Stamley Arkin	Joint W/P Priv.
11444-11448	09/28/2009	Bradley Edwards	Amy Ederi	FW:Epstein Depo	Joint W/P Priv.
05823	09/04/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
05832	09/08/2009	Adam Horowitz	Jacque Johnson	RE:Epstein	Joint W/P Priv.
05838	09/08/2009	Jacque Johnson	Jack Hill	RE:Epstein	Joint W/P Priv.
05847	09/09/2009	Jacque Johnson	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05859	07/23/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05863-05864	07/23/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05886-05887	07/24/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05902-05903	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05906-05907	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05912	08/27/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05928-05930	07/28/2009	Bradley Edwards	Katherine Ezell	RE:Epstein	Joint W/P Priv.
05933-05934	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05936	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05938	09/18/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
05940-05941	09/18/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05951	05/29/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05957-05960	09/09/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.
05970-05971	10/21/2009	Jacquie Johnson	Margaret Berk	RE:Epstein	Joint W/P Priv.
05982-05983	10/28/2009	Bradley Edwards	Spencer Kuvin	RE:Epstein	Joint W/P Priv.
05993-05994	09/09/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
05997	08/06/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
01029	10/08/2009	Bradley Edwards	Carolyn Edwards	Brian Ryalls	Joint W/P Priv.
07707	09/03/2009	Bradley Edwards	Kikka Claudio	RE:Regarding:C.M.A. vs. Epstein. Et al.(File# 281849)	Joint W/P Priv.
07708-07709	06/22/2009	Bradley Edwards	Amy Ederi	RE:Regular Monthly Cong. Call	Joint W/P Priv.
07734	07/24/2009	Jessica Caldwell	Bradley Edwards	RE:Release	Joint W/P Priv.
07218-07219	10/02/2009	Bradley Edwards	Katherine Ezell	RE:Meeting w/Stamley Arkin	Joint W/P Priv.
06861-06863	05/12/2009	Bradley Edwards	Katherine Ezell	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06876-06879	05/12/2009	Bradley Edwards	Stuart Mermelstein	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06891-06897	05/12/2009	Bradley Edwards	Katherine Ezell	RE:Jane Doe II v. Epstein	Joint W/P Priv.
06901	09/11/2009	Bradley Edwards	Mercedes Estrada	Re:Jane Doe No. 101 & Jane Doe No. 102 vs. Epstein-Cross Notice Of Depos	Joint W/P Priv.
06902	09/15/2009	Bradley Edwards	Mercedes Estrada	RE: Jane Doe No.101 & Jane Doe NO.102 vs. Epstein	Joint W/P Priv.
06903	09/04/2009	Bradley Edwards	Mercedes Estrada	RE: Jane Doe No.101 & Jane Doe NO.102 vs. Epstein-Cross-Notice of Taking Video Deposition	Joint W/P Priv.
06806-06807	09/09/2009	Bradley Edwards	Adam Horowitz	RE:Epstein	Joint W/P Priv.
06712	10/19/2009	Bradley Edwards	Kikka Claudio	RE: Igor Zinoview depo	Joint W/P Priv.
06713-06714	09/15/2009	Bradley Edwards	Robert Josefberg	RE:Epstein	Joint W/P Priv.

Privilege Log – Dated 2-23-2011
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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
06720-06727	10/14/2009	Bradley Edwards	Jack Hill	RE: Igor Zinoview depo	Joint W/P Priv.
06728	09/09/2009	Bradley Edwards	Kikka Claudio	RE:Epstein	Joint W/P Priv.
06711	09/09/2009	Kikka Claudio	Bradley Edwards	RE:Epstein	Joint W/P Priv.
06472	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06460-06464	05/08/2009	Bradley Edwards	Spencer Kuvin	RE:FYI Epstein Depo	Joint W/P Priv.
06455-06459	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06448-06452	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06420-06427	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
06416-06419	05/08/2009	Spencer Kuvin	Bradley Edwards	RE:FYI Epstein Depo	Joint W/P Priv.
05925-05926	07/28/2009	Katherine Ezell	Bradley Edwards	FW:Epstein	Joint W/P Priv.
05883-05584	07/24/2009	Katherine Ezell	Bradley Edwards	RE:Epstein	Joint W/P Priv.
05022-05025	09/10/2010	Adam Horowitz	Jacque Johnson	RE:Epstein-Notice of Production from Non Parties	Joint W/P Priv.
04724-04725	05/27/2009	Bradley Edwards	Katherine Ezell	RE:Epstein Cases-depositions in federal cases	Joint W/P Priv.
BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
06990-07002	06/11/2009	Brad Edwards	Katherine W. Ezell	June 10 th hearing-WPB-Confidential	Joint-privilege
07003-07006	06/26/2009	Amy Ederi	Brad Edwards	June 25 th hearing-WPB-	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
				Confidential	
07030	09/22/2009	Bradley Edwards J.	Spencer Kuvin	L.M. v. Epstein – defendant, Jeffrey Epstein's response to plaintiff	Joint-privilege
07090-07091	9/29/2009	Bradley Edwards J.	Katherine W. Ezell	Leslie Wexner	Joint-privilege
07092	10/29/2009	Stuart Mermelstein	Bradley J. Edwards	Leslie Wexner	Joint-privilege
07093	09/17/2009	Bradley Edwards J.	Katherine W. Ezell	Leslie Wexner	Joint-privilege
01484	05/21/2009	Robert Josefsberg C.	Bradley J. Edwards	Epstein	Joint-privilege
01503	08/24/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01517	09/18/2009	Adam Horowitz; Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01514	08/26/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01515	08/27/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01477	07/21/2009	Adam Horowitz; Stuart Mermelstein	Bradley J. Edwards	Epstein	Joint-privilege
01489	08/03/2009	Adam Horowitz	Bradley J. Edwards	Epstein	Joint-privilege
07110-07112	09/25/2009	Bradley Edwards J.	Spencer Kuvin	LM v EPSTEIN hearing 9/22/09	
07113-07114	09/25/2009	Spencer Kuvin	Bradley J. Edwards	LM v EPSTEIN hearing 9/22/09	Joint-privilege
07115-07116	09/25/2009	Bradley Edwards J.	Spencer Kuvin	LM v EPSTEIN hearing 9/22/09	Joint-privilege
07145-07146	09/22/2009	Adam Horowitz	Bradley J. Edwards	Mark Epstein	Joint-privilege
07211-07213	10/01/2009	Bradley Edwards J.	Spencer Kuvin	Meeting with Stanley Arkin	Joint-privilege
07210	10/06/2009	Stuart Mermelstein; Robert Josefsberg; c.	Katherine W. Ezell	Meeting with Leslie Wexner	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Bradley J. Edwards			
07214-07215	10/01/2009	Robert C. Josefsberg	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
07216-07217	10/02/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
07220-07223	10/01/2009	Spencer Kuvin	Bradley J. Edwards	Meeting with Stanley Arkin	Joint-privilege
07224-07225	10/02/2009	Katherine W. Ezell	Bradley J. Edwards	Meeting with Stanley Arkin	Joint-privilege
07226-07227	10/01/2009	Robert C. Josefsberg	Spencer Kuvin	Meeting with Stanley Arkin	Joint-privilege
07228-07229	10/01/2009	Bradley J. Edwards	Robert C. Josefsberg	Meeting with Stanley Arkin	Joint-privilege
07280-07283	08/06/2009	Adam Horowitz	Bradley J. Edwards	Motion for protective order	Joint-privilege
07633-07634	08/06/2009	Bradley J. Edwards	Kikka M. Claudio	Proposal Request	Joint-privilege
07710-07733	06/23/2009	Katherine W. Ezell	Bradley J. Edwards	Regularly Monthly Cong. Call	Joint-privilege
07740-07746	09/18/2009	Bradley J. Edwards	Adam Horowitz	Report this as a parole violation	Joint-privilege
07748-07757	09/18/2009	Adam Horowitz	Bradley J. Edwards	Report this as a parole violation	Joint-privilege
07913-07915	08/27/2009	Bradley J. Edwards	Spencer Kuvin	Sarah Kellen	Joint-privilege
07917-07918	08/27/2009	Spencer Kuvin	Jacquie Johnson	Sarah Kellen	Joint-privilege
07965-07966	08/12/2009	Katherine W. Ezell	Bradley J. Edwards	Subpoena directed to the investigators	Joint-privilege
07977-07978	10/09/2009	Bradley J. Edwards	Spencer Kuvin	Subpoena Info	Joint-privilege
01716	09/15/2009	Adam Horowitz	Elizabeth Villar	Epstein: Forensics/Investigations INVOICE	Joint-privilege
01768	07/13/2009	Richard Willits	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01771-01772	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epstein Investigator	Joint-privilege
01931	08/11/2009	Bradley J.	Lisa Rivera	Alfredo Rodriguez	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Edwards			
01998-01999	09/21/2009	Adam Horowitz	Margaret Berk	Correct Number -- Epstein Deposition	Joint-privilege
02021	05/14/2009	Bradley J. Edwards	Mercedes C. Estrada	Doe v. Epstein	Joint-privilege
02044	09/04/2009	Katherine W. Ezell	Bradley J. Edwards	E.W., L.M. Doe v. Epstein -- Letter from Bob Critton	Joint-privilege
02048	09/04/2009	Robert C. Josefsberg	Bradley J. Edwards	E.W., L.M. Doe v. Epstein -- Letter from Bob Critton	Joint-privilege
02054	05/12/2009	Spencer Kuvin	Bradley J. Edwards	Emailing Epstein deposition revised	Joint-privilege
02062	10/05/2009	Bradley J. Edwards	Amy Ederi	Epstein -- Confirming AT&T Dial in Tel. Conf. for Monday, 10/5/09 at 4:00 p.m.	Joint-privilege
02087	09/17/2009	Spencer Kuvin	Bradley J. Edwards	Epstein- Hearing	Joint-privilege
02140	08/04/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Depo -- New York	Joint-privilege
02147-02149	09/21/2009	Bradley J. Edwards	Amy Ederi	Epstein Depo	Joint-privilege
02174	07/20/2009	Adam Horowitz	Bradley J. Edwards	Epstein Matter -- Cross Notice of Alfredo Rodriguez Deposition	Joint-privilege
02209-02210	07/01/2009	Bert Patton	William J. Berger	Epstein v. State of Florida -- Emergency petition for Writ of Certiorari; Emergency motion to review denial of stay	Joint-privilege
02215-02217	07/24/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
02290	09/18/2009	Bradley J. Edwards	Spencer Kuvin	Epstein	Joint-privilege
02355-02356	06/10/2009	Mercedes C. Estrada	Susan K. Stirling	Hearing taken on 06/10/09 on motion to unseal before Judge Colbath	Joint-privilege
02362-02363	06/09/2009	Spencer Kuvin	Katherine W. Ezell	Hearing to Un-seal	Joint-privilege
02374-02375	09/15/2009	Jack Hill	Bradley J. Edwards	Igor Zinoview depo	Joint-privilege

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02420-02421	05/08/2009	Bradley J. Edwards	Mercedes C. Estrada	Jane Doe II v. Epstein	Joint-privilege
02435	09/15/2009	Bradley J. Edwards	Lisa Rivera	Jane Does v. Epstein	Joint-privilege
02438	09/18/2009	Bradley J. Edwards	Adam Horowitz	Jeffrey Epstein DC# W35755	Joint-privilege
02462	09/22/09	Spencer Kuvin	Bradley J. Edwards	L.M. v. Epstein -- Defendant, Jeffrey Epstein's Response to Plaintiff L.M.'s Motion for Protective Order	Joint-privilege
02476-02477	09/25/2009	Spencer Kuvin	Bradley J. Edwards	LM v EPSTEIN hearing	Joint-privilege
02516	10/06/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Leslie Wexner	Joint-privilege
02554-02559	08/03/2009	Adam Horowitz	Bradley J. Edwards	NEW ASSIGNMENT -- NEW ALBANY -- RUSH? -- Fwd: Federal Subpoena	Joint-privilege
02584	08/11/2009	Bradley J. Edwards	Kikka M. Claudio	Out of state subpoenas	Joint-privilege
02618	08/04/2009	Bradley J. Edwards	Kikka M. Claudio	Proposal Request	Joint-privilege
02627-02628	09/18/2009	Bradley J. Edwards	Adam Horowitz	Report this as a parole violation	Joint-privilege
02672-02673	10/09/2009	Spencer Kuvin	Bradley J. Edwards	Subpoena Info	Joint-privilege
02727	08/03/2009	Spencer Kuvin	Bradley J. Edwards	Transcript of Alfredo Rodriguez deposition	Joint-privilege
02896	06/08/2009	Bradley J. Edwards	Spencer Kuvin	Hearing to Un-seal	Joint-privilege
03009-03010	08/07/2009	Adam Horowitz	Jacquie Johnson	Motion to stay	Joint-privilege
03028-03029	09/21/2009	Bradley J. Edwards	Adam Horowitz	Mark Epstein	Joint-privilege
03038	10/06/2009	Bradley J. Edwards	Stuart Mermelstein	Meeting with Leslie Wexner	Joint-privilege
03131-03132	08/06/2009	Adam Horowitz	Bradley J. Edwards	Epsteins assets	Joint-privilege

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03243-03244	09/09/2009	Bradley J. Edwards	Adam Horowitz	EPSTEIN	Joint-privilege
03397-03400	09/29/2009	Adam Horowitz	Bradley J. Edwards	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Response in Opposition to Motion	Joint-privilege
03407-03414	09/29/2009	Bradley J. Edwards	Adam Horowitz	Activity in case 9:08-cv-80119-KAM Doe v. Epstein Response in Opposition to Motion	Joint-privilege
03451-03452	05/14/2009	Bradley J. Edwards	Spencer Kuvin	Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order on Motion to Stay	Joint-privilege
03477-03479	05/15/2009	Bradley J. Edwards	Spencer Kuvin	Activity in Case 9:08-cv-80893-KAM Doe v. Epstein Order to Motion to Stay	Joint-privilege
03619-03627	09/15/2009	Bradley J. Edwards	Spencer Kuvin	BB v. Epstein/EW v. Epstein	Joint-privilege
03631-03633	09/15/2009	Jacquie Johnson	William J. Berger	BB v. Epstein/EW v. Epstein	Joint-privilege
03646-03656	10/19/2009	Bradley J. Edwards	Katherine W. Ezell	Bill Riley's Subpoena & Depo Notice	Joint-privilege
03677-03687	07/08/2009	Bradley J. Edwards	Adam Horowitz	Can you send me those addresses?	Joint-privilege
03719-03736	09/04/2009	Bradley J. Edwards	Spencer Kuvin	CMA – depo notices attached.	Joint-privilege
03840-03847	08/02/2009	Stuart Mermelstein	Bradley J. Edwards	Continuing Deposition of Alfredo Rodriguez	Joint-privilege
03938-03939	09/29/2011	Katherine W. Ezell	Bradley J. Edwards	Deposition of Bill Riley	Joint-privilege
03943-03945	09/18/2009	Adam Horowitz	Jacquie Johnson	Deposition of Jean Luc Bruhnel	Joint-privilege
02911-02912	09/15/2009	Bradley J. Edwards	Jack P. Hill	Igor Zinoviev depo	Joint-privilege
02939	07/14/2009	Bradley J. Edwards	Adam Horowitz	Jane Does 2-7 v. Epstein	Joint-privilege
02977	10/16/2009	Katherine W.	Bradley J. Edwards	Leslie Wexner	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Ezell			
02978	10/29/2009	Bradley J. Edwards	Stuart Mermelstein	Leslie Wexner	Joint-privilege
02994	06/10/2009	Bradley J. Edwards	Mercedes C. Estrada	Preservation of evidence	Joint-privilege
07060	10/16/2009	Sid Garcia	Bradley J. Edwards	L.M. v. Epstein	Joint-privilege
06202	07/13/2009	Richard Willits	Bradley J. Edwards	Scheduling various depositions regarding Epstein	Joint-privilege
06409-06415	04/15/2009	Bradley J. Edwards	Katherine W. Ezell	FYI	Joint-privilege
06428-06447	05/06/2009	Spencer Kuvin	Bradley J. Edwards	FYI	Joint-privilege
06453-06454	04/15/2009	Spencer Kuvin	Bradley J. Edwards	FYI	Joint-privilege
06465-06471	04/15/2009	Katherine W. Ezell	Bradley J. Edwards	FYI	Joint-privilege
06476-06490	05/08/2009	Bradley J. Edwards	Spencer Kuvin	FYI	Joint-privilege
06630-06632	09/09/2009	Spencer Kuvin	Bradley J. Edwards	Hearing to Un-seal	Joint-privilege
06636-06639	09/09/2009	Bradley J. Edwards	Robert C. Josefsberg	Hearing to Un-seal	Joint-privilege
06702-06705	09/16/2009	Bradley J. Edwards	Kikka M. Claudio	Igor Zinoviev & Tommy Matola depositions	Joint-privilege
06706-06708	10/14/2009	Bradley J. Edwards	Kikka M. Claudio	Igor Zinoviev depo	Joint-privilege
06715-06719	10/09/2009	Jack P. Hill	Bradley J. Edwards	Igor Zinoviev depo	Joint-privilege
06729-06735	10/13/2009	Bradley J. Edwards	Jack P. Hill	Igor Zinoviev depo	Joint-privilege
06763	08/19/2009	Bradley J. Edwards	Stuart Mermelstein	IME's	Joint-privilege
06764-06766	09/10/2009	Bradley J. Edwards	Stuart Mermelstein	IME's	Joint-privilege
06770-06781	09/10/2009	Stuart Mermelstein	Bradley J. Edwards	IME's	Joint-privilege
06811-06812	08/20/2009	Katherine W.	Bradley J. Edwards	Is Mark Epstein JE's brother?	Joint-privilege

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
		Ezell			
06817-06819	09/23/2009	Adam Horowitz	Bradley J. Edwards	Is your client being deposed tomorrow?	Joint-privilege
06820-06822	07/02/2009	Bradley J. Edwards	Margaret Berk	Jane Doe 2 (Brinson) v. Epstein	Joint-privilege
06841-06860	05/12/2009	Bradley J. Edwards	Spencer Kuvin	Jane Doe II v. Epstein	Joint-privilege
06864-06875	05/12/2009	Spencer Kuvin	Bradley J. Edwards	Jane Doe II v. Epstein	Joint-privilege
06880-06890	05/12/2009	Bradley J. Edwards	Katherine W. Ezell	Jane Doe II v. Epstein	Joint-privilege
06898-06900	05/12/2009	Bradley J. Edwards	Stuart Mermelstein	Jane Doe II v. Epstein	Joint-privilege
06933-06934	07/14/2009	Adam Horowitz	Bradley J. Edwards	Jane Does 2-7 v. Epstein	Joint-privilege
06937-06938	10/05/2009	Spencer Kuvin	Jacque Johnson	Jane Does 2-8 v. Epstein – Cross NOD's of Oct. 6-8 depositions	Joint-privilege
06944-06952	09/22/2009	Bradley J. Edwards	Adam Horowitz	Jeffrey Epstein DC# W35755	Joint-privilege
16107	08/11/2009	Adam Horowitz	Jacque Johnson	Maxwells deposition	Joint-privilege
16123-16124	08/11/2009	Kikka M. Claudio	Jacque Johnson	Maxwells deposition	Joint-privilege
16799-16801	10/02/2009	Robert C. Josefbergs	Jacque Johnson	Meeting with Stanley Arkin	Joint-privilege
02947-02948	08/03/2009	Spencer Kuvin	Jacque Johnson	Epstein Depo – New York	Joint-privilege
02891-20906	10/01/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
20880-20882	10/02/2009	Bradley J. Edwards	Katherine W. Ezell	Meeting with Stanley Arkin	Joint-privilege
06042-06090	07/02/2009	William J. Berger	Spencer Kuvin	Ew 09-22784 cert. 4 th dca	Joint-privilege
06402-06403	06/10/2009	Bradley J. Edwards	Katherine W. Ezell	Hearing to Un-seal	Joint-privilege
01365-01366	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint-privilege
01340-01341	07/30/2009	Adam Horowitz	Jacque Johnson	Epstein Depositions	Joint-privilege
01331	06/30/2009	Stuart	Bradley J. Edwards	Epstein depositions	Joint-privilege

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		Mermelstein			
01319	08/11/2009	Adam Horowitz	Jacquie Johnson	Epstein Depo	Joint-privilege
01316	08/27/2009	Spencer Kuvin	Bradley J. Edwards	Epstein Depo	Joint-privilege
01314	10/30/2009	Stuart Mermelstein	Jacquie Johnson	Epstein Depo of Wexner	Joint-privilege
01298	05/26/2009	Bradley J. Edwards	Adam Horowitz	Epstein cases – depositions in federal cases	Joint-privilege
01294	08/10/2009	Jack P. Hill	Bradley J. Edwards	Epstein Assets	Joint-privilege
01273	07/13/2009	Katherine W. Ezell	Bradley J. Edwards	Epstein 2255 claims	Joint-privilege
01250	05/13/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein	Joint-privilege
01246	04/08/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Telephone Conference	Joint-privilege
01233-01234	07/31/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Monday, 8/3/09 – Monthly call in telephone conference – AT&T Call in No: (877) 468-2136 – participant code: 775593. Kathy is the host.	Joint-privilege
01224	06/16/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Monday, 8/3/09 – Monthly call in telephone conference – AT&T Call in No: (877) 468-2136 – participant code: 775593. Kathy is the host.	Joint-privilege
01185	10/30/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Confirming AT&T dial in tel. conf. for Monday, 11/2/09 at 4:00 p.m.	Joint-privilege
01186	10/02/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Confirming AT&T Dial in Tel. Conf. for Monday, 10/5/09 at 4:00 p.m.	Joint-privilege
01187	05/19/2009	Bradley J. Edwards	Mercedes Estrada C.	Epstein – Confirming AT&T Dial in Telephone Conference for Monday, 6/8/09 at 2:00 p.m.	Joint-privilege

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01188	05/12/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein – Confirming AT&T Dial in Telephone Conference for Tomorrow 5/13/09	Joint-privilege
01189	09/08/2009	Bradley J. Edwards	Iliana Yarzabal	Epstein – Confirming AT&T Dial in Telephone Conference for Wednesday, 9/9/09 at 3:00	Joint-privilege
01095-01096	04/15/2009	Spencer Kuvin	Bradley J. Edwards	Deposition of Epstein was set for tomorrow	Joint-privilege
01045	07/23/2009	Bradley J. Edwards	Richard Willits	CMA vs. Epstein	Joint-privilege
01649	07/08/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01641	06/11/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01639	05/29/2009	Bradley J. Edwards	Mercedes C. Estrada	Epstein	Joint-privilege
01619	10/28/2009	Bradley J. Edwards	Spencer Kuvin	Epstein	Joint-privilege
01660	07/22/2009	Bradley J. Edwards	Adam Horowitz	Epstein	Joint-privilege
01666	04/20/2009	Spencer Kuvin	Bradley J. Edwards	Epstein	Joint-privilege
01671	07/23/2009	Katherine W. Ezell	Bradley J. Edwards	Epstein	Joint-privilege
01680	08/24/2009	Jack P. Hill	Bradley J. Edwards	Epstein	Joint-privilege
04355-04358	09/04/2009	Jack Scarola	Bradley J. Edwards	Epstein – Depos of Marcinkova and Sarah Kellen	Joint-privilege
04446	09/03/2009	Bradley J. Edwards	Iliana Yarzabal	Epstein – Monday 8/3/09 – Monthly Call in Telephone Conference	Joint-privilege
04200-04201	09/04/2009	Bradley Edwards	Katherine W. Ezell	Letter from Bob Critton	Joint W/P Privilege
04220— 04221	09/04/2009	Bradley Edwards	Spencer Kuvin	Letter from Bob Critton	Joint W/P Privilege
04222-04223	09/04/2009	Bradley Edwards	Barry Stone	Letter from Bob Critton	Joint W/P Privilege

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04264	05/12/2009	Bradley Edwards	Spencer Kuvin	Epstein Depo	Joint W/P Privilege
04298-04299	09/16/2009	Jacquie Johnson	Adam Horowitz	Depo of Epstein	Joint W/P Privilege
04304	09/08/2009	Jacquie Johnson	Adam Horowitz	Epstein	Joint W/P Priv.
04335	10/30/2009	Bradley Edwards	Robert Josefsberg	Epstein- Confirming AT&T Tel. Conf.	Joint W/P Priv.
04359-04360	09/04/2009	Jacquie Johnson	Katherine Ezell	Depos of Marcinkova & Sarah Kellen	Joint W/P Priv.
04365	09/15/2009	Jacquie Johnson	Adam Horowitz	Epstein- Depo in New York	Joint W/P Priv.
04417	09/17/2009	Bradley Edwards	Spencer Kuvin	Epstein- Hearing	Joint W/P Priv.
04423-04424	09/09/2009	Jacquie Johnson	Adam Horowitz	Letter regarding Leslie Wexner	Joint W/P Priv.
04433-04436	06/16/2009	Spencer Kuvin	Bradley Edwards	Monthly Call in Tele. Conf.	Joint W/P Priv.
04447-04450	07/31/2009	Jacquie Johnson	Mercedes Estrada	Monthly Call in Tel. Conf.	Joint W/P Priv.
04491-04518	04/08/2009	Bradley Edwards	Jack Scarola	Epstein- Tel. Conf.	Joint W/P Priv.
04518	04/08/2009	Bradley Edwards	Robert Josefsberg	Epstein- Tel Conf.	Joint W/P Priv.
04524-04525	05/13/2009	Katherine Ezell	Bradley Edwards	Epstein Depo	Joint W/P Priv.
04580	10/14/2009	Jacquie Johnson	Adam Horowitz	Depo of Larry Visoski	Joint W/P Priv.
04640-04641	10/14/2009	Bradley Edwards	Adam Horowitz	Depo of Larry Visoski	Joint W/P Priv.
04723	05/26/2009	Bradley Edwards	Katherine Ezell	Epstein cases- Depos	Joint W/P Priv.
04726-04729	05/26/2009	Adam Horowitz	Bradley Edwards	Epstein cases- Witness depos	Joint W/P Priv.
04750-04754	08/04/2009	Spencer Kuvin	Bradley Edwards	Epstein depo- New York	Joint W/P Priv.
04763-04785	08/27/2009	Spencer Kuvin	Bradley Edwards	Epstein Depo Notice	Joint W/P Priv.
04797-04799	09/18/2009	Jacquie Johnson	Adam Horowitz	Epstein Depo	Joint W/P Priv.
04806-04813	07/28/2009	Jacquie Johnson	Adam Horowitz	Epstein Depos in New York	Joint W/P Priv.
04819	07/30/2009	Jack Scarola	Jacquie Johnson	Epstein Depos	Joint W/P Priv.
04831-04832	07/30/2009	Spencer Kuvin	Jacquie Johnson	Epstein Depos	Joint W/P Priv.
04835-04836	07/25/2009	Katherine Ezell	Bradley Edwards	Epstein Depos	Joint W/P Priv.

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04711	08/10/2009	Bradley Edwards	Jack Hill	Epstein assests	Joint W/P Priv.
04855-04858	08/18/2009	Bradley Edwards	Kikka Claudio	Epstein Depos	Joint W/P Priv.
04861	07/24/2009	Lisa Rivera	Jacque Johnson	Epstein Depos	Joint W/P Priv.
04876-04877	07/27/2009	Bradley Edwards	Spencer Kuvn	Epstein Depos	Joint W/P Priv.
04922-04923	09/16/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04925-04926	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04929-04934	09/25/2009	Bradley Edwards	Adam Horowitz	Epstein Hearing	Joint W/P Priv.
04937-04938	09/15/2009	Adam Horowitz	Jacque Johnson	Epstein Hearing	Joint W/P Priv.
04969-04972	07/20/2009	Adam Horowitz	Bradley Edwards	Alfredo Rodriguez Depo	Joint W/P Priv.
05026-05027	09/10/2009	Adam Horowitz	Jacque Johnson	Notice of Production from Non-Parties	Joint W/P Priv.
05031	09/25/2009	Bradley Edwards	Spencer Kuvn	Epstein Order	Joint W/P Priv.
05037-05038	09/25/2009	Bradley Edwards	Spencer Kuvn	Epstein Order	Joint W/P Priv.
05042-05043	09/25/2009	Spencer Kuvn	Bradley Edwards	Epstein Order	Joint W/P Priv.
05046	09/25/2009	Bradley Edwards	Spener Kuvn	Epstein Order	Joint W/P Priv.
05074-05076	08/18/2009	Stuart Mermelstein	Jacque Johnson	Epstein Sub. To Bears Stern	Joint W/P Priv.

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05100-05102	08/05/2009	Mercedes Estrada	Bradley Edwards	Improper Serving of Maxwell	Joint W/P Priv.
05105-05107	04/20/2009	Bradley Edwards	Spencer Kuvn	Hearing on Yellow Cab Objection	Joint W/P Priv.
05110	08/06/2009	Adam Horowitz	Kikka Claudio	Address for Nadia Marcinkova	Joint W/P Priv.
05118-05119	09/09/2009	Adam Horowitz	Bradley Edwards	Motion for Protective Order	Joint W/P Priv.
05157-05158	09/10/2009	Adam Horowitz	Bradley Edwards	Motion for Protective Order	Joint W/P Priv.
05167-05168	05/29/2009	Bradley Edwards	Margaret Berk	Spencer Cross-Examination	Joint W/P Priv.
05171-05172	05/29/2009	Bradley Edwards	Mercedes Estrada	Transcripts	Joint W/P Priv.
05201-05202	09/10/2009	Adam Horowitz	Bradley Edwards	Rules on Doe no. 4	Joint W/P Priv.
05222-05223	07/10/2009	Bradley Edwards	Katherine Ezell	File case	Joint W/P Priv.
05226	07/10/2009	Bradley Edwards	Spencer Kuvn	Epstein 5 th Amendment rights	Joint W/P Priv.
05229	07/10/2009	Bradley Edwards	Adam Horowitz	Motions to Compel	Joint W/P Priv.
05232-05233	07/10/2009	Bradley Edwards	Adam Horowitz	Motions fully briefed	Joint W/P Priv.
05247	07/23/2009	Katherine Ezell	Bradley Edwards	Answers to the 1 st set of ROGS	Joint W/P Priv.
05251-05252	07/24/2009	Katherine Ezell	Bradley Edwards	Depo dates	Joint W/P Priv.
05258	07/25/2009	Katherine Ezell	Bradley Edwards	Switzerland Witness regarding Epstein Egg Shaped 2 inch PENIS!	Joint W/P Priv.
05265-05266	07/22/2009	Adam Horowitz	Spencer Kuvn	Alfredo Rodriguez depo	Joint W/P Priv.

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BATES	DATE	TO	FROM	DESCRIPTION	OBJECTION
05286-05287	07/28/2009	Katherine Ezell	Bradley Edwards	Switzerland Witness regarding training of little girls as sex traps	Joint W/P Priv.
05293-05294	07/28/2009	Katherine Ezell	Bradley Edwards	Calling Switzerland witness	Joint W/P Priv.
05326-05327	08/24/2009	Bradley Edwards	Spencer Kuvin	Emails searchable	Joint W/P Priv.
05331	08/06/2009	Kikka Claudio	Bradley Edwards	Epstein address	Joint W/P Priv.
05334-05335	05/29/2009	Bradley Edwards	Mercedes Estrada	TV Interview that is too explicit	Joint W/P Priv.
05347	08/24/2009	Bradley Edwards	Spencer Kuvin	Seeking Computers	Joint W/P Priv.
05350	08/10/2009	Kikka Claudio	Bradley Edwards	Current address for Nadia Marcinkova	Joint W/P Priv.
05353-05354	09/09/2009	Katherine Ezell	Bradley Edwards	Distribution of Costs	Joint W/P Priv.
05367	09/10/2009	Jacque Johnson	Bradley Edwards	Voicemail	Joint W/P Priv.
05373-05374	08/10/2009	Kikka Claudio	Bradley Edwards	Supoenas for depos	Joint W/P Priv.
05391-05393	04/20/2009	Spencer Kuvin	Bradley Edwards	Yellow Cab stuff	Joint W/P Priv.
05400-05401	10/19/2009	Adam Horowitz	Bradley Edwards	Religious Dildo Washer	Joint W/P Priv.
05414-05415	08/10/2009	Kikka Claudio	Bradley Edwards	Sjoberg's current address	Joint W/P Priv.
05437-05439	04/20/2009	Bradley Edwards	Spencer Kuvin	Yellow Cab stuff	Joint W/P Priv.
05444-05445	08/10/2009	Bradley Edwards	Kikka Claudio	Setting Depos	Joint W/P Priv.
05451	05/29/2009	Mercedes Estrada	Bradley Edwards	Motion for Status Conf.	Joint W/P Priv.