

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION**
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IN RE:

CASE NO.: 09-34791-RBR

ROTHSTEIN ROSENFELDT ADLER, P.A.,

CHAPTER 11

Debtor.

**MOTION FOR EMERGENCY HEARING AND FOR A STAY OF COURT ORDER
DIRECTING PREPARATION OF PRIVILEGE LOG**

Movant, LM, through counsel, pursuant to L.R. 9075-1 hereby requests an emergency hearing before December 28, 2010 and moves to briefly stay enforcement of *its* Order [DE 1068] compelling LM and her counsel Farmer, Jaffe, Weissing, Edwards, Fistos, & Lehrman, P.L. ("FJW") to produce a privilege log in order to permit the state court: (1) to first rule on the pending motions for summary judgment and for protective order which make the privilege log and production irrelevant; and/or (2) to permit FJW sufficient time to prepare an appropriate privilege log relating to documents which now exceed 24,000 email-related pages. In support, FJW on behalf of LM states as follows:

I. BACKGROUND

A. The Pending Summary Judgment and Protective Order Motions

As this Court is well aware, Jeffrey Epstein (a convicted sex offender) has sued one of his alleged victims, [REDACTED] as well as [REDACTED] attorney, Bradley J. Edwards, Esq.¹, in Florida state court for conduct that allegedly occurred in the course of Edwards' representation of multiple young female victims of Epstein's sexual abuse. While an employee of the now defunct Rothstein, Rosenfeldt, Adler firm and with his current firm, Edwards filed and pursued civil lawsuits

¹ Mr. Edwards, an attorney with the FJW firm, is represented by Jack Scarola of the firm Searcy, Denny, Scarola, Barnhart, and Shipley..

against Epstein to recover damages for Epstein's extensive pattern of molestations. [REDACTED] refers to one of Mr. Edwards's clients who was an Epstein victim. In retaliation and to try and intimidate Edwards and his young clients, Epstein brought his state lawsuit alleging that Edwards had somehow fabricated the claims. Edwards has filed a comprehensive motion for summary judgment against Epstein in state court, detailing how he is entitled to judgment on each and every one of Epstein's frivolous claims. Epstein has yet to file any response to Edwards' comprehensive summary judgment motion. The hearing on that Motion is set for January 5, 2011 in front of the state trial court. In addition to the Summary Judgment Motion, Edwards has filed a Motion for Protective Order in the state court case to narrow the exact state subpoena that Epstein is trying to litigate in this Bankruptcy Court. That Motion is set for hearing for January 27, 2011. A Notice of Filing containing that Motion was filed with this Court [DE 1197].

B. Epstein's Attempts to Involve this Court in the State Litigation

Despite that summary and protective order motions are pending in state court, Epstein continues to harass Edwards through pursuing discovery requests connected with the state court case and has tried to disrupt the state court proceeding by getting this Court involved in enforcement of an identical subpoena issued in state court. In particular, on April 12, 2010, Epstein propounded an extremely broad Request for Production (RFP) to Edwards under state-court discovery procedures. Containing some 27 different requested items, the RFP seeks all sorts of electronically stored information, including a raft of internal emails between Edwards and other attorneys, paralegals, expert witnesses, investigators, and others who worked on the civil lawsuits against Epstein. On May 11, 2010, Edwards duly responded to the request for production. Through his legal counsel, Edwards noted that many of the requests sought attorney-client or work-product privileged information and others were overly broad and unduly burdensome. On April 16, 2010, four days after making the requests to Edwards – without

waiting for his responses to the requests, much less a court ruling on Edwards' objections – Epstein served a state-court subpoena duces tecum for documents on bankruptcy court-appointed trustee, Herb Stettin, which asked for the identical inform. Mr. Stettin never represented any of the underage females who had been sexually abused by Epstein. Instead, Mr. Stettin has possession of certain records related to this case – and many more entirely unrelated to this case – because he was court-appointed as bankruptcy trustee for the now-defunct law firm of Rothstein Rosenfeldt Adler (RRA). RRA's electronic database, including all electronically stored files and emails, were left in the possession of Stettin. Because Stettin was not involved in the sexual abuse litigation against Epstein, he does not have detailed knowledge of the persons or subjects discussed in the various e-mails and other records.

On June 28, 2010, a hearing was set before the state court on Epstein's Motion to Compel the Trustee to produce the documents responsive to Epstein's subpoena. On that date, Stettin's counsel, Edwards' counsel, and counsel for Epstein all met in the hallway outside the courtroom and worked out an agreed resolution to the dispute. All counsel agreed that Stettin would turn over to Edwards's counsel all documents responsive to the subpoena and that Edwards' counsel would then prepare a privilege log and produce all documents that are not subject to objection or privilege. According to their understandings, counsel for Epstein was to prepare a consent order memorializing the agreement. It never did. Instead, Epstein decided to launch litigation in yet another forum – the United States Bankruptcy Court for the Southern District of Florida. On July 14, 2010, Epstein filed a Motion to Compel production of numerous documents from Trustee Stettin in the bankruptcy proceeding being overseen by the bankruptcy court [DE 672]. This filing sparked a series of motions for protective orders [DE's 818, 819, 1022]; appointment of Broward County Circuit Judge Robert Carney as special master to take all materials responsive to the subpoena from Stettin and to prepare a privilege log [DE 888]; filings of

motions for clarification by the special master due in part to the difficulty of the requested materials [DE 1013]; and filings other motions regarding the substance of the requests and the tactics Epstein was employing to force a federal court to rule on state-court request for documents many of which included privileged materials.

II. ARGUMENT

A. An Emergency Ruling Is Necessary

1. The Agreement on the Production of the Privilege Log

In the midst of the foregoing, Epstein's counsel and FJW entered certain understandings to work out the production pursuant to the Court-ordered production of email [DE 1068] and creation of a privilege log. Under these understandings, Stettin's counsel produced a series of three CDs to FJW at different times. However, these CDs did *not* duplicate what was provided to the special master, which has led to confusion over the materials subject to the privilege log. Also, FJW and Epstein's counsel entered into an agreement that FJW would produce the privilege log 15 days after hard-copies of the email were bates labeled and produced to FJW. The emails were produced in seven bankers boxes on December 13, 2010. According to the agreement, the due date would thus be December 28, 2010. FJW entered this agreement based upon its reliance on the representation by counsel for the trustee that there would be 6000-7000 emails to review. FJW indicated to the Court in previous motions that substantially more emails were produced in the original CD'S; however, counsel for the trustee informed FJW that the original production was incorrect and included many more emails than were intended to be produced. With that in mind, and with the understanding that, again, there would be approximately 6,000 emails produced, FJW entered into an agreement as to privilege log production time. Yet, the total emails actually produced total at least 24,000. Many of the email are privileged. It is physically impossible to review all of these emails in 15 days, not to mention

creating a privilege log from all of these emails (a document that itself could be a hundred pages long or more). This task would force the operation of FJW to come to a halt and require every attorney and staff member to stop everything and dedicate 100% of their time to creating this privilege log at a great cost to FJW. An expeditious hearing and ruling on this Motion is thus needed prior to December 28, 2010, so that FJW will not risk noncompliance with this Court's orders regarding production of the privilege log.

2. Production of the Log Now Makes No Sense

Furthermore, staying production of the privilege log makes good sense. As set forth above, two state court motions have been properly presented, and Edwards is requesting that this Court merely allow the state court to rule on properly presented motions regarding how to proceed in its own case. So as a simple matter of federal-state comity, this Court should stay enforcement of its order for a short period of time.

A short stay would not harm anyone and would likely lead to a rapid resolution of the issue. If the state court agrees either to grant the motion for summary judgment or to narrow the scope of subpoenas, it would essentially obviate the need for the Bankruptcy Court to rule at all on any issues dealing with the scope of the subpoena or the privilege issues that must ultimately be decided by the state court. On the other hand, if the state court rejects the motions, then LM agrees to produce the privilege log as directed. In either case, the matter will be quickly resolved in a matter of weeks. And only by leaving the issue up to the state court can duplication and potential unfair burden be avoided. A short delay of a few weeks to the other side will cause no prejudice.

B. Certification Under Rule 9075-1(B)

The undersigned certifies that a bona fide effort was made to resolve this matter without a hearing, but was unsuccessful.

WHEREFORE, FJW on behalf of LM respectfully requests that this Court stay further enforcement of its court order compelling production of a privilege log by FJW pending further rulings on the Summary Judgment Motion and Motion for Protective Order in the state court action where Epstein has chosen to file his lawsuit.

I HEREBY CERTIFY that a true and correct copy of the foregoing was served electronically to the debtor, the attorney for the debtor, the trustee, all CM/ECF subscribers, and by email or U.S. Mail on those parties listed on the attached service list this 16th day of December, 2010.

I HEREBY CERTIFY that I am admitted to the Bar of the United State District Court for the Southern District of Florida and I am in compliance with the additional qualifications to practice in this court set forth in Local Rule 2090-1(A).

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