

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

JEFFREY EPSTEIN

Complex Litigation, Fla. R. Civ. Pro.1201

Plaintiff,

Case No. 50 2009CA040800XXXXMB AG

v.

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

Defendants.

_____/

EPSTEIN'S FIRST REQUEST FOR ADMISSIONS TO EDWARDS

Plaintiff, JEFFREY EPSTEIN, pursuant to Fla. R. Civ. P. 1.370, requests that Defendant, BRADLEY J. EDWARDS ("Edwards" and/or "You" and/or "Your") admit or deny the following:

1. Admit that in Your March 23, 2010 deposition You testified under oath (at page 12), there are only three cases in existence against Jeffrey Epstein in which You represent a plaintiff (Jane Doe, L.M. and E.W.).
2. Admit that the testimony described in Request No. 1 is false.
3. Admit that in Your March 23, 2010 deposition you testified under oath You only filed three cases against Jeffrey Epstein.
4. Admit that the testimony described in Request No. 3 is false.
5. Admit that the Motion to Proceed Anonymously (DE #3) asserted that L.M. "was an identified victim by the FBI and U.S. Attorney's office in a criminal investigation against the Defendant, Jeffrey Epstein."

6. Admit that the assertion in Request No. 5 is false.
7. Admit that in paragraph 8 of Your answer to the Complaint in this action, You asserted that "RRA never filed a lawsuit on behalf of L.M."
8. Admit that the assertion described in Request No. 7 is false.
9. Admit that in paragraph 8 of Your answer to the Complaint in this action, You asserted that lawsuits filed on behalf of L.M. and other victims "were filed by EDWARDS prior to any association with or knowledge of RRA."
10. Admit that the assertion described in Request No. 9 is false.
11. Admit that in paragraph 9 of the Complaint (DE #1) in Case No. 09-CV-81092 it is alleged that Epstein "coerc[ed] or forc[ed] the then-minor L.M. to perform oral sex on him."
12. Admit that the allegations described in Request No. 11 are false.
13. Admit that in paragraph 17 of Your answer to the Complaint in this action, You admitted that "[r]elevant 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."
14. Admit that Scott Rothstein was involved in the decision to file the Complaint

(DE #1) in Case No. 09-CV-81092.

15. Admit that Russell Adler was involved in the decision to file the Complaint (DE #1) in Case No. 09-CV-81092.

16 Admit that in her September 24, 2009 deposition L.M. testified under oath (at page 71), that she never had oral sex with Epstein.

17. Admit that You caused to be filed a Complaint (DE #1) on behalf of L.M. in the case styled L.M. v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division on July 24, 2009. A copy of the Complaint is attached as **Exhibit A**.

18. Admit that a Complaint (DE #1) was filed on behalf of L.M. in the case styled L.M. v. Jeffrey Epstein, Case No. 09-CV-81092 in the United States District Court, Southern District of Florida, Miami Division, under Your name, Florida Bar number and e-mail address while you were employed by Rothstein, Rosenfeldt & Adler ("RRA").

19. Admit that the Complaint (DE #1) in Case No. 09-CV-81092 is two hundred thirty-four (234) pages, contains six hundred forty-four (644) paragraphs and one hundred fifty-six (156) counts.

20. Admit that in Your March 23, 2010 deposition You testified under oath (at page 226) that You had no other professional e-mail addresses while at RRA except [REDACTED]
[REDACTED]

21. Admit that a Motion to Keep True Name Sealed in Envelope (DE #2) was filed in Case No. 09-CV-81092 under Your name, Florida Bar number and e-mail address.

22. Admit that a Motion to Proceed Anonymously (DE #3) was filed on behalf of L.M. in Case No. 09-CV-81092 under Your name, Florida Bar number and e-mail address.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 18 day of June, 2010:

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff,

vs.

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

Defendant,

EDWARDS' RESPONSE TO FIRST REQUEST FOR ADMISSIONS

Defendant/Counterplaintiff, BRADLEY J. EDWARDS, hereby files his Response to Plaintiff, JEFFREY EPSTEIN'S First Request for Admissions to Edwards dated June 18, 2010 as follows:

1. Denied. The transcript is accurate but Request for Admission No. 1 does not accurately describe the testimony.
2. Denied. A Complaint was filed in Federal Court against Jeffrey Epstein on behalf of L.M., but never served.
3. Denied.
4. Denied on the grounds that no such testimony was given.
5. Admitted.
6. Denied.
7. Admitted.

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EDWARDS' REPONSE TO FIRST REQUEST FOR ADMISSIONS
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8. Denied. While a second Complaint was filed in Federal Court on behalf of L.M., it was never served and, therefore, RRA never prosecuted a lawsuit on behalf of L.M. except for the suit filed prior to Edwards' association with RRA.

9. Admitted.

10. Denied. See response to Request for Admission No. 8.

11. Admitted.

12. Admitted. This allegation which is accurate as to E.W. was mistakenly carried over to L.M. in the drafting of the Complaint on behalf of L.M.

13. Admitted.

14. Denied.

15. Denied.

16. Admitted.

17. Admitted.

18. Admitted.

19. Admitted.

20. Admitted.

21. Admitted.

22. Admitted.

23. Admitted.

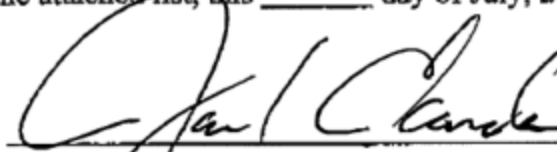
24. Admitted.

25. Admitted.

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- 26. Admitted.
- 27. Admitted.
- 28. Admitted.
- 29. Admitted.
- 30. Denied.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
Fax and U.S. Mail to all counsel on the attached list, this 7th day of July, 2010.



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