

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

CASE NO.: 502009CA040800XXXXMBAG

JEFFREY EPSTEIN,

Plaintiff/Counter-Defendant,

JUDGE: DAVID CROW

vs.

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

Defendants/Counter-Plaintiff,

EPSTEIN'S OBJECTIONS TO EDWARDS'S REVISED EXHIBIT LIST

Plaintiff/Counter-Defendant Jeffrey Epstein ("Epstein"), by and through his undersigned counsel and pursuant to Paragraph D4 of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, hereby objects to the following of Defendant/Counter-Plaintiff Bradley Edwards's trial exhibits (numbered in order as they appeared in Edwards's Revised Exhibit List):

1. All applicable criminal statutes
4. Video of Jeffrey Epstein's home and route from victim to Epstein's home
5. Order confirmation from Amazon.com for purchase of books "SM 101: A Realistic Introduction," "Slave Craft: Roadmap for Erotic Servitude-Principles, Skills and Tools" and "Training Miss Abernathy: A Workbook for Erotic Slaves and Their Owners"
6. Non-Prosecution Agreement
7. Jane Doe 102 Complaint

8. Messages taken from message pads found at Epstein's home
9. Documents related to Jeffrey Epstein produced by Alfredo Rodriguez
10. Jeffrey Epstein flight logs
11. Jeffrey Epstein phone records
12. [REDACTED] s phone records
13. Jail Visitation Logs
14. Jeffrey Epstein's probation file
15. All probable cause affidavits related to criminal investigation of Jeffrey Epstein
16. All evidence, information and documents taken or possessed by FBI related to criminal investigation of Jeffrey Epstein
17. Victims' statements to the FBI related to criminal investigation of Jeffrey Epstein
18. Video of Search Warrant of Jeffrey Epstein's home being executed
19. Application for Search Warrant of Jeffrey Epstein's home
20. Complaint [REDACTED] v. Epstein and all subsequent Amended Complaints
21. All records of homes, properties, bank accounts and any and all records related to Jeffrey Epstein's assets
24. List of corporations owned by Jeffrey Epstein
25. All documents evidencing relationship between Jeffrey Epstein and Jean Luc Brunel
26. All documents evidencing relationship between Jeffrey Epstein and MC2 or any modeling agencies
27. Yearbooks of Jane Doe
28. 2002 Royal Palm Beach High School Year Book
29. 2001 Royal Palm Beach High School Year Book
30. 2003 Palm Beach Gardens High School Year Book

31. Affidavit and Application for Search Warrant on Jeffrey Epstein's home
32. Tape recording or transcript of recording of conversation between Jeffrey Epstein and George Rush
33. Notepads found in Jeffrey Epstein's home and/or during trash pulls outside of his home during criminal investigation
34. The Palm Beach State Attorney's Criminal file against Jeffrey Epstein
35. All documents related to Jeffrey Epstein's 6/30/08 conviction
36. Jeffrey Epstein's criminal plea colloquy
37. Public records from the Department of Corrections related to Jeffrey Epstein
38. Records from the Florida Department of Law Enforcement related to Jeffrey Epstein
39. All statements made by Jeffrey Epstein
40. List of properties and vehicles in Larry Visoski's name
41. All of Jeffrey Epstein's Responses to Requests for Production, Requests for Admission, Answers to Interrogatories in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092
42. All discovery related responses of Jeffrey Epstein in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092
43. Jeffrey Epstein's Answers and Affirmative Defenses in all civil cases against him
44. All Complaints in which Jeffrey Epstein was a plaintiff or defendant
45. Jeffrey Epstein's Deposition testimony and discovery responses in cases 08-80119, 08-80232, 08-80380, 08-80381, 08-80994, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092
46. Jeffrey Epstein's Deposition testimony and discovery responses in State Court cases LM v. Jeffrey Epstein, Case No. 502008CA028051XXXXMB AB and E.W. v. Jeffrey Epstein, Case No. 502008CP003626XXXXMB

48. Any and all newspaper articles, online articles or publications related to Jeffrey Epstein
49. Report and Analysis of Jeffrey Epstein's assets
50. Video footage (DVD) of walk through site inspection of Jeffrey Epstein's home.
51. Photos of all of Jeffrey Epstein's properties, cars, boats and planes
52. Probable Cause Affidavits prepared against Jeffrey Epstein and [REDACTED]
53. Audio tape of [REDACTED]
54. Photographs, videos and books taken in the search warrant of Jeffrey Epstein's home
55. Documents related to or evidencing Jeffrey Epstein's donations to law enforcement
56. Victim Notification Letter from US Attorney's Office to Victim
57. Expert Dr. L. Dennison Reed's Report of Victim
58. Palm Beach Police Department Incident Report dated 4/20/06
59. All reports and documentation generated by Palm Beach Police Department related to Jeffrey Epstein
60. All Witness Statements generated by Palm Beach Police Department relating to Jeffrey Epstein
61. Passenger Manifests of Jeffrey Epstein's aircraft and private plane flight logs
62. Passenger lists for flights taken by Jeffrey Epstein
63. Letter from Jeffrey Epstein to Alberto Pinto regarding house island project
64. Jeffrey Epstein's bank statements
- . * Jeffrey Epstein's tax returns (this item not numbered on Edwards's Trial Exhibit Listt)
65. MC2 emails involving communications of Jeffrey Epstein, Jeff Puller [REDACTED]
[REDACTED]

66. DVD of plea and colloquy taken on 6-30-08
67. Transcript of plea and colloquy taken on 6-30-08
68. Massage Table
69. Lotions taken from Jeffrey Epstein's home during search warrant
70. Computers taken from Jeffrey Epstein's home during search warrant
71. Vibrators, dildos and other sex toys taken from Jeffrey Epstein's home during search warrant
72. No Contact Orders entered against Jeffrey Epstein
73. Criminal Score Sheet regarding Jeffrey Epstein
74. Documents evidencing Jeffrey Epstein's Community Control and Probation
75. Jeffrey Epstein's Sex Offender Registration
76. Jeffrey Epstein's Booking photograph
77. CAD calls to 358 El Brillo Way, Palm Beach FL 33480
78. List of Jeffrey Epstein's House contacts
79. Documents related to Jeffrey Epstein's investments
80. Letter from Chief Michael Reiter to Barry Krischler
81. List of planes owned by Jeffrey Epstein
82. Letter from Guy Fronstin to Assistant State Attorney dated 1-11-06
83. Letter from Guy Fronstin to Assistant State Attorney dated 1-13-06
84. Letter from Guy Fronstin to Assistant State Attorney dated 2-17-06
85. Letter from Guy Fronstin to Assistant State Attorney dated 4-6-06
86. Letter from Guy Fronstin to Assistant State Attorney dated 4-10-06
87. Letter from Goldberger dated 6-22-06

88. All subpoenas issued to State Grand Jury
89. Documents related to the rental of a vehicle for [REDACTED]
90. Ted's Sheds Documents
91. Documents related to property searches of Jeffrey Epstein's properties
92. Arrest Warrant of [REDACTED]
93. Police report regarding [REDACTED] picking up money dated 11-28-04
94. List of Trilateral Commission Members of 2003
95. Alan Dershowitz Letter dated 4-19-06 and Statute 90.410
96. Guy Fronstin letter dated 4-17-06
97. Jeffrey Epstein Account Information
98. Jeffrey Epstein Criminal Closeout Sheet-
99. Jeffrey Epstein Polygraph Test and Results
100. Victim's GED testing information and results
101. JEGE, Inc. Passenger Manifest
102. Hyperion Air Passenger Manifest
103. Flight information for [REDACTED]
104. Passenger List Palm Beach flights 2005
105. Jeffrey Epstein notepad notes
106. Pleadings of [REDACTED] 1 and 2 v. US case
107. Jeffrey Epstein 5th Amendment Speech
108. Reiter letter to Krisher dated 5-1-06
109. Jail receipts of Jeffrey Epstein
110. [REDACTED] Police Report dated 11-28-04

111. Compulsory Medial Examination of victim, CMA
112. Victim's school records and transcripts
113. Victim Notification letter dated 7-9-08
114. Victim's employment records from IHOP
115. Police report of Juan Alessi theft at Jeffrey Epstein's home
116. Victim's Medical Records from Milton Girls Juvenile Facility
117. Victim's Medical Records from Dr. Randee Speciale
118. Victim's Medical Records from Wellington Regional Hospital
119. Victim's Medical Records from St. Mary's Medical Center
120. Victim's Medical Records from United Health
121. All surveillance conducted by law enforcement on Jeffrey Epstein's home
122. Emails received from Palm Beach Records related to Jeffrey Epstein
123. All items listed on the Palm Beach Police Property Report Lists
124. All items taken in the execution of the search warrant of Jeffrey Epstein's home:
358 El Brillo Way, Palm Beach FL 33480
125. All copies of convictions related to Jeffrey Epstein
126. Jeffrey Epstein criminal records
127. All documents produced by Palm Beach Police Department prior to the deposition
of Detective Recarey
128. Photographs of all persons listed on Victims' Witness Lists
129. Statements, deposition transcripts, videotaped depositions and transcripts taken in
connection with this and all related cases and exhibits thereto
130. Any and all expert witness reports and/or records generated in preparation for this
litigation by any party to this cause
132. Curriculum vitae of Dr. Ryan Hall

133. Any articles or publications of Dr. Ryan Hall
134. Any articles or publications of Dr. Richard Hall
135. Any articles or publications of Dr. L. Dennison Reed
136. All items and documentation review by Dr. L. Dennison Reed
137. Transcript and video (DVD) of IME of Victims
138. All exhibits to Dr. L. Dennison Reed's Deposition
139. All exhibits to Dr. Richard Hall's Deposition
140. All items and documents reviewed by Dr. Richard Hall
141. All items and documents reviewed by Dr. Ryan Hall
142. Demonstrative aids and exhibits including, but not limited to, anatomical charts, diagrams and models, surveys, photographs and similar material including blow-ups of the foresaid items.- need to see before we agree
143. Any and all mortality tables
149. All pleadings and attachments in the action under the Crime Victims Rights Act prosecuted by Bradley Edwards on behalf of victims of Epstein's criminal molestations.
150. All attachments to Edwards's Motion for Summary Judgment.
151. All time records and hourly billing documentation produced in discovery.
152. All pleadings filed by Epstein in the Rothstein bankruptcy proceeding.
153. All Settlement Agreements between Epstein and victims of his sexual molestations.

Epstein objects to all of the afore-referenced Exhibits on several grounds, including, *but not limited to*: Relevance; Prejudice; Confusion; Misleading; Hearsay; Impermissible/Inadmissible Character Evidence; Impermissible/Inadmissible Evidence of other Crimes, Wrongs, or Acts; and the fact that most of the items on this list were not

provided to Epstein through discovery or otherwise *in this case*, in direct violation of this Court's Order Setting Jury Trial and Directing Pretrial and Mediation Procedures, and Epstein's "Exhibit A" to Bradley J. Edwards's Deposition *Duces Tecum*.

By listing these grounds for objection to the afore-listed Exhibits, Epstein is not waiving his right to assert additional objections, or objections to any non-listed Exhibits at trial.

WE HEREBY CERTIFY that a true and correct copy of the foregoing was served, via electronic service, to all parties on the attached service list, this September 19, 2013.

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