

Epstein v. Rothstein
List of Witnesses

1. Scott W. Rothstein
Rothstein Rosenfeldt & Adler
2. Bradley J. Edwards
Rothstein Rosenfeldt & Adler
3. Jeffrey Epstein
4. William Berger
Rothstein Rosenfeldt & Adler
5. Russell Adler
Rothstein Rosenfeldt & Adler
6. Mike Fisten
7. Kenneth Jenne
8. Patrick Roberts
9. Richard Fandrey
10. Herb Stettin
11. David Bodden
12. Deborah Villegas
Rothstein Rosenfeldt & Adler
13. Andrew Barnett
14. Christina Kitterman
15. Corporate Representative
Q-Task
16. Ghislaine Maxwell
17. Each investor and potential investor who reviewed the approximate ten (10) boxes of cases, real or fabricated, against Jeffrey Epstein shown by Scott Rothstein to solicit third party

investments.¹

18. Each attorney at Conrad Scherer who reviewed the approximate ten (10) boxes of cases, real or fabricated, against Jeffrey Epstein.²

19. Edward J. Morse

20. Carol Morse

21. Ted Morse

22. Patricia A. Morse

23. Corporate Representative
Morse Operations, Inc.

EXHIBITS

1. Any and all documents, including but not limited to, emails, correspondence, and settlement agreements, between, or on behalf of RRA, its employees, agents or clients, and any third party regarding a purported settlement of any litigation between Jeffrey Epstein and a RRA client, or the financing of any litigation between Jeffrey Epstein and a RRA client.

2. Any and all documents, including but not limited to, emails, correspondence and written agreements between, or on behalf of RRA, its employees, agents, or clients and any third party regarding the solicitation and/or receipt of money in return for settlement funds allegedly paid or to be paid by Jeffrey Epstein.

3. Any and all documents, including but not limited to, emails, correspondence and written agreements between, or on behalf of RRA, its employees, agents, or clients and any third party regarding the solicitation of money to help finance ongoing litigation against Jeffrey Epstein.

4. Any and all documents, including but not limited to, emails, correspondence and written agreements between, or on behalf of RRA, its employees, agents, or clients and any third party regarding the solicitation of money to be given to, or used on behalf of, the Plaintiffs in litigation against Jeffrey Epstein.

5. Any and all documents, including but not limited to, emails, correspondence, and written

¹ The names of the investors are unknown to Plaintiff at this time and will be provided upon receipt and review of the discovery pertaining to the investors and potential investors.

²The names of the attorneys are unknown to Plaintiff at this time and will be provided during discovery of same.

agreements between, or on behalf of RRA, its employees, agents, or clients and any third party regarding communication between third party investors or potential investors and the Plaintiffs or their attorneys involved in litigation against Jeffrey Epstein.

6. Any and all documents, including but not limited to, emails, correspondence, canceled checks, bank statements, and written agreements between, or on behalf of RRA, its employees, agents, or clients and any third party regarding payments made to RRA to or on behalf of any investor for settlement of any litigation involving Jeffrey Epstein.

7. Any and all documents, including but not limited to, emails, data, correspondence, memos, or similar documents between Bradley J. Edwards and any investor or third party person or entity regarding Jeffrey Epstein or which mentions Jeffrey Epstein as it relates to any purported investment pertaining to litigation involving Jeffrey Epstein.

8. Any and all documents, including but not limited to, emails, data, correspondence, memos, or similar documents between Scott W. Rothstein and any investor or third party person or entity regarding Jeffrey Epstein or which mentions Jeffrey Epstein as it relates to any purported investment pertaining to litigation involving Jeffrey Epstein.

9. Any and all documents, including but not limited to, emails, data, correspondence, memos, or similar documents between William Berger and any investor or third party person or entity regarding Jeffrey Epstein or which mentions Jeffrey Epstein as it relates to any purported investment pertaining to litigation involving Jeffrey Epstein.

10. Any and all documents, including but not limited to, emails, data, correspondence, memos, or similar documents between Russell Adler and any investor or third party person or entity regarding Jeffrey Epstein or which mentions Jeffrey Epstein as it relates to any purported investment pertaining to litigation involving Jeffrey Epstein.

11. Any and all documents, including but not limited to, emails, data, correspondence, written agreements or memos between Bradley J. Edwards and any other attorney, employee or agent of RRA regarding Jeffrey Epstein relating to any investment or potential investment in any case involving Jeffrey Epstein.

12. Any and all documents, including but not limited to, emails, data, correspondence, written agreements or memos between Scott W. Rothstein and any other attorney, employee or agent of RRA regarding Jeffrey Epstein relating to any investment or potential investment in any case involving Jeffrey Epstein.

13. Any and all documents, including but not limited to, emails, data, correspondence, written agreements or memos between and any other attorney, employee or agent of RRA regarding Jeffrey Epstein relating to any investment or potential investment in any case involving Jeffrey Epstein.

14. Any and all agreements or documents, including but not limited to, emails, correspondence

and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and Scott W. Rothstein.

15. Any and all agreements or documents, including but not limited to, emails, correspondence and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and Bradley J. Edwards.

16. Any and all agreements or documents, including but not limited to, emails, correspondence and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any employee, agent or attorney with RRA.

17. Any and all agreements or documents, including but not limited to, emails, correspondence and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any employee, agent, member or officer of any entity formed by RRA to create investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.

18. Any and all agreements or documents, including but not limited to, emails, correspondence and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any employee, agent, member or officer of any entity formed by Scott W. Rothstein to create investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.

19. Any and all agreements or documents, including but not limited to, emails, correspondence and memos which were provided to or received from an investor or potential investor relating to any case (real or fabricated) involving Jeffrey Epstein and any employee, agent, member or officer of any entity formed by Bradley J. Edwards to create investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.

20. Any and all documents made available to any investor or potential investor by Bradley J. Edwards to solicit "investors" for any case involving Jeffrey Epstein.

21. Any and all documents made available to any investor or potential investor by Scott W. Rothstein to solicit "investors" for any case involving Jeffrey Epstein.

22. Any and all documents made available to any investor or potential investor by any employee, attorney or agent of RRA to solicit "investors" for any case involving Jeffrey Epstein.

23. Any and all documents made available to any investor or potential investor by any employee, attorney or agent of any entity owned by Scott W. Rothstein to solicit "investors" for any case involving Jeffrey Epstein.

24. Any and all documents reflecting the names and addresses of all individuals or entities who invested or purported to invest in any aspect of any case against Jeffrey Epstein.

25. Any and all documents which purport to evidence any transfer of funds or property to investors from Jeffrey Epstein by way of RRA for the settlement of any case, real or fabricated, against Jeffrey Epstein.
26. Any and all documents which purport to evidence any transfer of funds or property to investors from Jeffrey Epstein by way of Scott W. Rothstein for the settlement of any case, real or fabricated, against Jeffrey Epstein.
27. Any and all documents which purport to evidence any transfer of funds or property to investors from Jeffrey Epstein by way of any entity owned by Scott W. Rothstein for the settlement of any case, real or fabricated, against Jeffrey Epstein.
28. Any and all documents relating to any investment, joint-venture or business enterprise involving RRA that reference any claim, real or fabricated, against Jeffrey Epstein.
29. The entire bankruptcy file In Re: Rothstein, Rosenfeldt & Adler, P.A.
30. All files pertaining to cases, real or fabricated, against Jeffrey Epstein which were shown to any "investors" or potential investors to solicit investment opportunities for third party investors to invest in any plaintiff's case against Jeffrey Epstein.
31. All Q-Task Projects that refer to Jeffrey Epstein.
32. All Q-Task Projects that refer to L.M., E.W., or Jane Doe.
33. Any employment agreements and correspondence describing compensation benefits for Bradley Edwards during his employment with RRA.
34. All documents from the "Fortress" software program that refer or relate to Jeffrey Epstein.
35. All documents from the "Fortress" software program that refer or relate to L.M., E.W., or Jane Doe.
36. The deposition of Jeffrey Epstein taken on March 17, 2010.
37. The deposition including all exhibits of Bradley J. Edwards taken on March 24, 2010.
38. All interrogatories served on Bradley J. Edwards and responses thereto.
39. All Requests for Admissions served on Bradley J. Edwards and responses thereto.
40. All Requests for Admissions served on Bradley J. Edwards and responses thereto.
36. All documents produced by Bradley J. Edwards in response to Requests for Production.

37. All documents and emails produced by the bankruptcy trustee In Re: Rothstein, Rosenfeldt & Adler.
38. All Interrogatories served on Scott W. Rothstein and responses thereto.
39. All Requests for Admissions served on Scott W. Rothstein and responses thereto.
40. All Requests for Production served on Scott W. Rothstein and responses thereto.
41. Plaintiff reserves his right to supplement this list of witnesses and exhibits.