

**United States District Court  
Southern District of New York**

Virginia L. Giuffre,

Plaintiff,

Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

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**DECLARATION OF BRADLEY J. EDWARDS REGARDING HIS MOTION FOR  
ADMISSION PRO HAC VICE**

I, Bradley J. Edward, declare as follows:

1. I am an attorney at law duly licensed in the State of Florida. I maintain my office at the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L., in Fort Lauderdale, Florida. I respectfully submit this declaration in support of my Motion for Admission Pro Hac Vice.

2. For many months now, I have been actively working to help represent Ms. Giuffre in this case, although not in a counsel of record capacity. I am an experienced trial lawyer and have worked frequently with protective orders, including protective orders in sexual assault cases.

3. I filed a lawsuit regarding alleged defamatory statements made by Alan Dershowitz along with co-plaintiff Paul G. Cassell. Dershowitz counterclaimed against us. That lawsuit has been resolved to the mutual satisfaction of all parties. Attached as Exhibit 1 are true and correct copies of the relevant portions of the dismissals signed by all three of the parties and filed with the Court. It is my understanding that, under Florida law, this filing ends the litigation

between the parties without the need for any further action by the Court. The litigation also involved a subpoena served on Jeffrey Epstein, which he moved to quash. After the trial court denied Epstein's motion to quash, he filed a challenge to the decision in the Florida Court of Appeals. In light of the settlement of the underlying litigation in which the subpoena was served, his appeal is now moot. I made no claims for any relief in his appeal. Both parties to that litigation agreed to a 60 day stay of that litigation pending settlement, as reflected in true and correct copies of the relevant portions of an agreement to stay. Exhibit 2.

4. I am also involved as a party to pending litigation against Jeffrey Epstein. In 2009, Jeffrey Epstein filed a lawsuit against me, attacking my representation of three sex abuse victims in their lawsuits against Epstein. These victims were *not* Ms. Giuffre. Epstein dismissed that lawsuit. I also filed a counterclaim against Epstein, which alleges malicious prosecution by Epstein. (Ghislaine Maxwell is not named in my counterclaim.) A true and correct copy of my counterclaim is attached as Exhibit 3. That counterclaim alleges, in essence, that Epstein lawsuit against me was filed "for the sole purpose of further attempting to intimidate Edwards, L.M., and others into abandoning or settling their legitimate claims for less than their just and reasonable value." Exhibit 3 at 3.

5. Apart from the litigation mentioned in the previous two paragraphs, I am not a party to any litigation involving allegations of Jeffrey Epstein's sexual abuse. I do not anticipate becoming a party to any litigation involving allegations of Jeffrey Epstein's sexual abuse.

6. I am familiar with the protective order entered in this case and intend to be bound by it. In light of my training as an attorney as well as my experience with protective orders, I do anticipate any problems arising with complying with the order. My understanding is that the

protective order currently permits disclosure of confidential material to me because I am (and long have been) an attorney “actively working on the case.” Protective Order at 2.

I declare under the penalty of perjury that the foregoing is true and corrected.

Executed on April 21, 2016, in New York City, New York.

By: /s/ Bradley J. Edwards  
Bradley J. Edwards

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 21<sup>st</sup> day of April 2016, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Bradley J. Edwards  
Bradley J. Edwards