

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 0:16-mc-61262-JEM

**In re: SUBPOENA TO
BRADLEY J. EDWARDS**

Underlying Case:

VIRGINIA L. GIUFFRE,

Plaintiff

v.

GHISLAINE MAXWELL,

Defendant

No. 15-cv-07433-RWS (S.D.N.Y)

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**MOTION OF BRADLEY J. EDWARDS TO FILE AN OVER LENGTH
REPLY IN SUPPORT OF HIS MOTION TO QUASH SUBPOENA OR,
IN THE ALTERNATIVE, FOR A PROTECTIVE ORDER**

COME NOW Bradley J. Edwards, by and through undersigned counsel, to file this motion for leave to file a reply not to exceed 25 pages in support of his Motion to Quash Subpoena or, in the Alternative, for a Protective Order in this action.

As the Court is aware, on June 13, 2016, Bradley J. Edwards filed a twenty page motion to quash a subpoena that had been served on him by Defendant Maxwell in connection with a complicated case in the Southern District of New York, *Giuffre v. Maxwell*, No. 15-cv-07433-RWS (S.D.N.Y.). The motion was supported by seven exhibits. The Court opened the case as a miscellaneous case.

On June 30, 2016, Defendant Maxwell filed a sixteen-page response to the Motion to Quash. The response made allegations about whether Edwards had engaged in proper filings in other court cases. The response also suggested that Edwards's client, Ms. Giuffre, had withheld discovery information that she was required to produce in the Southern District of New York. The response was supported by 18 exhibits, including 5 exhibits that were under seal. The exhibits total approximately 200 pages in length.

Edwards has now drafted a reply to the response filed by Maxwell. The reply contains nine pages of introductory and factual material and fourteen pages of argument. The fourteen pages of argument are required to fully address the issues raised by Maxwell's response, including discussing recent developments in the underlying case in the Southern District of New York. The subpoena at issue contains multiple sub-parts and a number of complicated issues are presented by the requests it contains.

Opposing counsel have been contacted for a position on the motion. Plaintiff will supplement this motion once such position has been obtained.

DATED: July 7, 2016

Respectfully Submitted,

/s/ Jack Scarola

Jack Scarola

Florida Bar No.: 169440

Attorney E-Mail(s): jsx@searcylaw.com and
mep@searcylaw.com

Primary E-Mail: _scarolateam@searcylaw.com

Searcy Denney Scarola Barnhart & Shipley, P.A.

2139 Palm Beach Lakes Boulevard

West Palm Beach, Florida 33409

Phone: (561) 686-6300

Fax: (561) 383-9451

*Attorney for non-party respondent
Bradley J. Edwards*

CERTIFICATE OF SERVICE

I certify that on July 7, 2016, I electrically served the foregoing pleading via the Court's CM/ECF filing system on:

Laura A. Menninger
Jeffrey S. Pagliuca
Haddon, Morgan and Foreman, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: (303) 831-7364
Fax: (303) 832-2628
lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell