

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

Related 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

**NOTICE OF SUPPLEMENTAL AUTHORITY ON PLAINTIFF JANE DOE'S MOTION
FOR AN ORDER TO SHOW CAUSE AND FOR AN ORDER TO COMPEL AND
INCORPORATED MEMORANDUM OF LAW [DE 483]**

Plaintiff, Jane Doe, hereby gives notice of filing portions of the probation file of Defendant, Jeffrey Epstein, in connection with the above referenced Motion for Order to Show Cause and to Compel the Deposition of Jean Luc Brunel [DE 483].

On March 10, 2010 Plaintiff filed her Motion for an Order to Show Cause and for an Order to Compel [DE 483] requesting entry of an Order directed to Jean Luc Brunel and his counsel ordering them to show cause why they should not be held in contempt, for sanctions, and for an Order compelling Jean Luc Brunel to appear for deposition.

Plaintiff's counsel recently obtained Epstein's probation file that contains documents that further corroborate Plaintiff's position that Brunel has not remained out

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of the country as Brunel's counsel suggested, but has in fact been staying with Epstein much of 2010, if we are to believe the records Epstein provided to probation.

The portions of the probation file, specifically the Written Monthly Reports from December 2009 through February 2010 are attached hereto as Exhibit "A." A section of the Written Monthly Report requires Defendant to "List full names, ages, and your relationship to all persons who resided at your residence this month" in the middle section of the form.

Defendant identifies Jean Luc Brunel in his probation papers as residing with him within the period of December 2009 to February 2010, when Ms. Kudman represented him to be out of Florida.

As indicated in our previous pleading, Mr. Brunel was served for deposition, and his counsel Ms. Kudman represented that she would produce him for deposition in Florida.

She ultimately reneged, saying that her client told her that he was in France indefinitely and would not be returning to the United States, a representation known to be false.

In an email dated January 25, 2010, Ms. Kudman responds to a request for dates for her client's deposition by writing, "I have just been informed that my client will be out of the country until the end of March." (Email attached here to as Exhibit "B")

Again, while it is not believed that Ms. Kudman made the false representation intentionally, and it is more likely that Mr. Brunel simply made that false representation

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to his attorney, it is impossible for the undersigned to know with any degree of certainty exactly who participated in this plan to obstruct Jane Doe's discovery.

As such, Plaintiff files her supplemental authority and requests the relief previously sought.

DATED: May 17, 2010

Respectfully Submitted,

s/ Bradley J. Edwards
Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone: [REDACTED]
Facsimile: [REDACTED]
Florida Bar No.: [REDACTED]
E-mail: [REDACTED]

and

Paul G. Cassell
Pro Hac Vice
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: [REDACTED]
Facsimile: [REDACTED]
E-Mail: [REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 17, 2010 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically filed Notices of Electronic Filing.

s/ Bradley J. Edwards
Bradley J. Edwards

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SERVICE LIST

**Jane Doe v. Jeffrey Epstein
United States District Court, Southern District of Florida**

Jack Alan Goldberger, Esq.
[REDACTED]

Robert D. Critton, Esq.
[REDACTED]

Isidro Manual Garcia
[REDACTED]

Jack Patrick Hill
[REDACTED]

Katherine Warthen Ezell
[REDACTED]

Michael James Pike
[REDACTED]

Paul G. Cassell
[REDACTED]

Richard Horace Willits
[REDACTED]

Robert C. Josefsberg
[REDACTED]

Adam D. Horowitz
[REDACTED]

Stuart S. Mermelstein
[REDACTED]

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Notice of Supplemental Authority on Plaintiff Jane Doe's Motion for an Order to Show
Cause and for an Order to Compel and Incorporated Memorandum of Law [DE 138]*

EXHIBIT A

STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS
WRITTEN MONTHLY REPORT

Officer's Name: _____
For Month Ending: _____
Date/Time submitted: _____

YOUR NAME: Jeffrey Epstein

DC#: W35755

YOUR RESIDENCE ADDRESS: (include Name of Subdivision, Apartment Complex and Number, Mobile Home Park and Lot Number, if applicable):

358 El Brillo Way
Palm Beach, FL 33480
(Provide physical location - NOT Post Office Box)

TELEPHONE No. _____

CELLULAR TELEPHONE No. _____

PAGER No. _____

Vehicle Make/Model/Year/Tag #: _____

EMPLOYER: FSF

SUPERVISOR'S NAME: Darren Indyke

EMPLOYER'S ADDRESS: _____

EMPLOYER'S TELEPHONE No. _____

CELLULAR TELEPHONE No. _____

PAGER No. _____

EMPLOYER EMAIL: _____

YOUR TOTAL MONEY EARNED MONTHLY: \$ 10K + (Gross Amount)

Full time Part-time _____ Hours Worked _____
Additional (2nd) employment information: _____

List full names, ages, and your relationship to all persons who resided at your residence during this month:
JL-63 - 27-31 - V.C-55, NADIA MATCUMIA - 25 girl/son, R.A, 26r
Staff 20 20

Have you consumed alcoholic beverages? YES NO
Have you used or bought illegal drugs or controlled substances? YES NO
Have you attended educational, vocational classes or mental health, drug, alcohol, therapy, or self-improvement programs? YES NO
(If yes, circle which one)
Have you been arrested or had any contact with law enforcement during the last month? YES NO

If yes, explain what happened on separate sheet of paper, attached to report.

If you went into debt for any reason, explain: _____

If not working, give reason and source of income: _____

If you have any questions or problems to discuss with your Officer, explain: _____

If monetary obligation owed, amount paid this month: \$ _____

Receipts are available through your probation officer. DO NOT SUBMIT CASH OR PERSONAL CHECKS!
Make money order payable to the Department of Corrections.

If monetary obligation owed and no payment made, give reason and date when payment will be made: _____

Official Use Only
Signature of Officer Receiving Report: _____
Date WMR Received: JAN 05 2010
Date WMR Due: _____
Comments: 15-4
P. O. S.

I certify the above to be true and complete:
Your Signature: _____
Mailing Address: Stam as above
City: _____
State: _____ Zip: _____
E-Mail Address: _____
(if applicable)

STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS
WRITTEN MONTHLY REPORT

Officer's Name: _____
For Month Ending: _____
Date/Time submitted: _____

YOUR NAME: Judy Epstein
DC#: W35755

YOUR RESIDENCE ADDRESS: (include Name of Subdivision, Apartment Complex and Number, Mobile Home Park and Lot Number, if applicable):
358 El Brith
Palm Beach FLORIDA

(Provide physical location - NOT Post Office Box)

TELEPHONE No. [REDACTED]
CELLULAR TELEPHONE No. [REDACTED]
PAGER No. _____

Vehicle Make/Model/Year/Tag #: _____

EMPLOYER: FCF
SUPERVISOR'S NAME: J. Davis
EMPLOYER'S ADDRESS: _____

EMPLOYER'S TELEPHONE No. [REDACTED]
CELLULAR TELEPHONE No. _____

PAGER No. _____
EMPLOYER EMAIL: _____
YOUR TOTAL MONEY EARNED MONTHLY: \$ 10.16 (Gross Amount)

Full time Part-time _____ Hours Worked _____
Additional (2nd) employment information: _____

List full names, ages, and your relationship to all persons who resided at your residence during this month:

Jan L. 63 - Friend - 54.30 - 8622 - ADDIE MORCHERUS 21 - sister, LF. JP - 37.11
Ad. 27 Friend Friend Friend

Have you consumed alcoholic beverages? YES NO
Have you used or bought illegal drugs or controlled substances? YES NO
Have you attended educational, vocational classes or mental health, drug, alcohol, therapy, or self-improvement programs? YES NO
(If yes, circle which one)
Have you been arrested or had any contact with law enforcement during the last month? YES NO

If yes, explain what happened on separate sheet of paper, attached to report.

If you went into debt for any reason, explain: _____

If not working, give reason and source of income: _____

If you have any questions or problems to discuss with your Officer, explain: _____

If monetary obligation owed, amount paid this month: \$ _____

Receipts are available through your probation officer. DO NOT SUBMIT CASH OR PERSONAL CHECKS!
Make money order payable to the Department of Corrections.

If monetary obligation owed and no payment made, give reason and date when payment will be made: _____

Official Use Only:
Signature of Officer Receiving Report: _____
Date WMR Received: _____
Date WMR Due: _____
Comments: 2-3-20

I certify the above to be true and complete:
Your Signature: _____
Mailing Address: 358 El Brith
City: Palm Beach FL
State: FL Zip: 33480
E-Mail Address: JEEVAP@scn.com
(if applicable)

Officer's Name: W. H. H. H.
For Month Ending: _____
Date/Time submitted: _____

STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS
WRITTEN MONTHLY REPORT

YOUR NAME: Jeffrey Epstein
DC#: W35755

EMPLOYER: FSF

YOUR RESIDENCE ADDRESS: (include Name of Subdivision, Apartment Complex and Number, Mobile Home Park and Lot Number, if applicable):
358 El Brilloway
Palm Beach, FL 33480

SUPERVISOR'S NAME: J. D. G. A.
EMPLOYER'S ADDRESS: _____



(Provide physical location - NOT Post Office Box)

EMPLOYER'S TELEPHONE No. _____

TELEPHONE No. _____

CELLULAR TELEPHONE No. _____

CELLULAR TELEPHONE No. _____

PAGER No. _____

PAGER No. _____

EMPLOYER EMAIL: _____

YOUR TOTAL MONEY EARNED MONTHLY:
\$ 710.00 (Gross Amount)

Full time Part-time _____ Hours Worked _____
Additional (2nd) employment information: _____

Vehicle Make/Model/Year/Tag #: _____

List full names, ages, and your relationship to all persons who resided at your residence during this month:
Nadia Marcinin, SA - 31 Fruit, 76 - Fruit 22, J.L.B. - 65, D.L. Lugin 50

Have you consumed alcoholic beverages? YES NO
Have you used or bought illegal drugs or controlled substances? YES NO
Have you attended educational, vocational classes or mental health, drug, alcohol, therapy, or self-improvement programs? YES NO
(If yes, circle which one)
Have you been arrested or had any contact with law enforcement during the last month? YES NO
If yes, explain what happened on separate sheet of paper, attached to report.
If you went into debt for any reason, explain: _____
If not working, give reason and source of income: _____
If you have any questions or problems to discuss with your Officer, explain: _____

If monetary obligation owed, amount paid this month: \$ _____

Receipts are available through your probation officer. DO NOT SUBMIT CASH OR PERSONAL CHECKS!
Make money order payable to the Department of Corrections.

If monetary obligation owed and no payment made, give reason and date when payment will be made: _____

Official Use Only:
Signature of Officer Receiving Report: [Signature]
Date WMR Received: _____
Date WMR Due: _____
Comments: 1035AM
3/1/10

I certify the above to be true and complete:
Your Signature: [Signature]
Mailing Address: 358 El Brilloway
City: PP
State: FL Zip: 33480
E-Mail Address: _____
(if applicable)

*CASE NO: 08-CV-80119-MARRA/JOHNSON
Notice of Supplemental Authority on Plaintiff Jane Doe's Motion for an Order to Show
Cause and for an Order to Compel and Incorporated Memorandum of Law [DE 138]*

EXHIBIT B

Beth Williamson

From: Tama Beth Kudman [REDACTED]
Sent: Monday, January 25, 2010 4:10 PM
To: Beth Williamson
Subject: Re: Regarding: Epstein - Depo of Jean Luc Brunel

I have just been informed that my client will be out of the country until the end of March. Please ask Mr Edwards to call me to discuss this.

Thank you

Sent from my iPhone
Tama Beth Kudman

On Jan 25, 2010, at 3:22 PM, Beth Williamson <[REDACTED]> wrote:

Dear Ms. Kudman:

My name is Beth. I am assisting Brad Edwards in the Epstein matters. I just wanted to follow-up on the voicemail I left you. I understand your client Jean Luc Brunel will be available the first two weeks of February for deposition. Please provide me dates of availability as soon as possible, as calendars are filling.

Thank you,

Beth Williamson, FRP

Florida Registered Paralegal

Farmer, Jaffe, Weissing,

Edwards, Fistos & Lehrman, P.L.

425 North Andrews Avenue, Suite 2

Fort Lauderdale, Florida 33301

[REDACTED]

[REDACTED] fax

[REDACTED]