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11. Please identify your five closest friends for the years 2006 – 2010, including their full name, current address, home telephone number and cellular telephone number.

ANSWER:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, an unwarranted invasion of privacy and not reasonably calculated to lead to admissible evidence. Subject to and without waiving said objections, Plaintiff states:

1.

2.

3.

4.

Plaintiff does not have a fifth person that she would consider "a close friend" during that time period.

12. Do you intend to call at trial other females who went to Mr. Epstein's residence? If so, please identify each individual, including their name, current address, home telephone number and cellular telephone number, and identify her counsel. Also, please state the substance of each witness's testimony.

Answer:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, cumulative, and calling for speculation. Subject to and without waiving said objections, Plaintiff states:

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Plaintiff has not yet identified all of the witnesses she intends to call at trial. The witnesses who went to Epstein's residence include:

Jane Doe No. 2

Address previously provided by Mermelstein & Horowitz, P.A.,
While still a minor, Jane Doe No. 2 was brought to Defendant Epstein's home by Jane Doe No. 3 wherein she was sexually assaulted by Defendant Epstein in a manner during a massage wherein she was paid \$200.00. See transcript of Jane Doe No. 2's deposition.

Jane Doe No. 4

Address previously provided by Mermelstein & Horowitz, P.A.
While still a minor, Jane Doe No. 4 was brought to Defendant Epstein's home by [REDACTED] an agent and employee of Defendant Epstein, wherein she was repeatedly sexually assaulted during the course of a massage wherein she was paid \$200.00 for each sexual assault. Additionally, she will testify that she was generally called by Defendant Epstein's employees, [REDACTED] and [REDACTED] when Defendant Epstein wanted Jane Doe No. 4 to come to his home for sexual activity. See transcript of Jane Doe No. 4's deposition.

Jane Doe No. 5

Address previously provided by Mermelstein & Horowitz, P.A.,
As a minor, Jane Doe No. 5 went to Defendant Epstein's home as the result of a conversation with an agent of Defendant Epstein who attended school with Jane Doe No. 5. While at Defendant Epstein's home, she was sexually assaulted by Defendant Epstein during the course of a massage wherein she was paid \$200.00. See transcript of Jane Doe No. 5's deposition.

Jane Doe No. 6

Address previously provided by Mermelstein & Horowitz, P.A.
As a minor, Jane Doe No. 6 was brought to Defendant Epstein's home by [REDACTED] to provide him with a massage. During the course of the massage, she was sexually assaulted by Defendant Epstein and was paid \$200.00. See transcript of Jane Doe No. 6's deposition.

Jane Doe No. 7

Address previously provided by Mermelstein & Horowitz, P.A.
As a minor, Jane Doe No. 7 was brought to Defendant Epstein by his employee and agent [REDACTED] to give Defendant Epstein a massage. She was also called on the telephone by Defendant Epstein's agent and employee, [REDACTED] when Defendant Epstein wanted her to come to his home for a massage. During the course of the massages, Jane Doe No. 7 was sexually assaulted by Defendant Epstein. She was paid \$200.00 each time. See transcript of Jane Doe No. 7's deposition.

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Jane Doe No. 8

Address previously provided by Mermelstein & Horowitz, P.A.

As a minor, Jane Doe No. 8 was brought to Defendant Epstein's home by [REDACTED] to give Defendant Epstein a massage. During the course of the massage, Defendant Epstein sexually assaulted Jane Doe No. 8. She was paid \$200.00 for the massage/sexual assault.

[REDACTED]
Home address unknown

c/o [REDACTED] Esq.

Upon information and belief, [REDACTED] was brought to Defendant Epstein's home by his employee and/or agent to give Defendant Epstein a massage wherein he sexually assaulted [REDACTED] on at least one occasion. She will also likely testify that she knew Jane Doe No. 6 and introduced her to [REDACTED] who brought Jane Doe No. 6 to Defendant Epstein's home for a massage.

Jane Doe

Home address unknown

c/o [REDACTED] Esq.

Upon information and belief, Jane Doe was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe on at least one occasion. See transcript of Jane Doe's deposition.

[REDACTED]
Home address unknown

c/o [REDACTED] Esq.

Upon information and belief, [REDACTED] was brought or invited to Defendant Epstein's home by his employee and/or agent to give Defendant Epstein a massage wherein he sexually assaulted [REDACTED] on at least on occasion. She will also likely testify that she knew Jane Doe No. 6 and brought Jane Doe No. 6 to Epstein's home at his request, and that Defendant Epstein paid her to bring other girls. See transcript of [REDACTED] deposition.

[REDACTED]
Home address unknown

c/o [REDACTED] Esq.

Upon information and belief, [REDACTED] was bought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted [REDACTED] on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls. See transcript of [REDACTED] deposition.

[REDACTED]
Home Address Unknown

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c/o [REDACTED] Esq.

Upon information and belief, [REDACTED] was bought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted C.M.A. on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls. See transcript of [REDACTED] deposition.

[REDACTED]
Home address unknown

Upon information and belief, [REDACTED] was bought or invited to Defendant Epstein's home to give him a massage by his agent/employee wherein he sexually assaulted [REDACTED] on at least one occasion. She will also likely testify that she was paid by Defendant Epstein to recruit and bring other underage girls to his home for "massages" wherein he sexually assaulted the underage girls, including, but not limited to, Jane Doe Nos., 3, 4, and 7. See transcript of [REDACTED] deposition.

Jane Doe No. 101

Home Address Unknown

c/o [REDACTED] Esq.

Upon information and belief, Jane Doe No. 101 was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe No. 101 on at least one occasion.

Jane Doe No. 102

Home address unknown

c/o [REDACTED] Esq.

Upon information and belief, Jane Doe No. 102 was invited or bought to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted Jane Doe 102 on at least one occasion.

Jane Doe No. 103

c/o [REDACTED] Esq.

Upon information and belief, Jane Doe No. 103 was invited or bought to Defendant Epstein's by his agent/employee home to give him a massage wherein he sexually assaulted Jane Doe 103 on at least one occasion.

[REDACTED]
c/o [REDACTED] Esq.

D.D. went with Jane Doe No. 5 to Defendant Epstein's home to give him a massage wherein she was sexually assaulted. Upon information and belief, she was also brought/invited to Defendant Epstein's home on subsequent occasions to give him a massage wherein she was sexually assaulted. [REDACTED] will also likely testify that she was still a minor when the sexual assaults occurred.

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██████████
Home address unknown
c/o ██████████ Esq.

██████████ is likely to testify that she was brought or invited to Defendant Epstein's home by his agent/employee to give him a massage wherein he sexually assaulted her on at least one occasion. She will likely testify that she was still a minor when the sexual assault(s) occurred.

██████████
Home address unknown

██████████ is likely to testify that she was friends with Jane Doe No. 5 and ██████████, and knew them to have gone to Defendant Epstein's home on at least one occasion to give him a massage, and that they stated Defendant Epstein touched them in a sexual manner. ██████████ is likely to testify that she too went to Defendant Epstein's home to give him a massage and during the course of that massage, Defendant Epstein touched her in sexual manner while she was still a minor.

██████████
Home address unknown

██████████ is likely to testify that she was repeatedly sexually assaulted by Defendant Epstein at his home during the course of massages. She is also likely to testify that Defendant Epstein forced her to engage in sexual intercourse with him against her will, and that she was forced to engage in sexual activity with Epstein's employee/agent, ██████████, against her will. She is likely to testify that she was a minor when these events occurred.

██████████
Home Address Unknown

██████████ is likely to testify that she was brought or invited to Defendant Epstein's home by his employee/agent to give Defendant Epstein a massage wherein she was sexually assaulted on at least one occasion. ██████████ is likely to testify that she was a minor when these events occurred.

██████████
Home address unknown

██████████ is likely to testify that she was friends with Jane Doe Nos. 3, 4, and 7, and knew them to go to Defendant Epstein's home to give him massages. She is also likely to testify that she was brought or invited to Defendant Epstein's home by an agent of Defendant Epstein to give him a massage wherein she was sexually assaulted. She is likely to testify that these events occurred when she was a minor.

██████████
Home address unknown

██████████ is likely to testify that she was friends with Jane Doe No. 3 and knew Jane Doe No. 3 to have gone to Defendant Epstein's home to give him a massage.

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██████████ is also likely to testify that she was brought or invited to Defendant Epstein's home by his agent to give him a massage wherein he sexually assaulted her. She is also likely to testify that these events occurred when she was a minor.

██████████ is likely to testify that she was friends with Jane Doe No. 3 during the relevant time period, and that she was brought to Defendant Epstein's home by ██████████ to give him a massage wherein he touched her in a sexual manner. She is also likely to testify that she was a minor when these events occurred.

██████████ is likely to testify that she was friends with Jane Doe No. 7 and was brought to Defendant Epstein's house to provide him with a massage, wherein she was sexually assaulted by Defendant Epstein. She is also likely to testify that she was a minor when these events occurred.

██████████
Address unknown

c/o ██████████ Esq.

██████████ is likely to testify that she was brought or invited to Defendant Epstein's home by his agent or employee to give him a massage wherein she was sexually assaulted on at least one occasion. She is likely to testify that she was a minor when these events occurred.

Jane Doe II

Address unknown

c/o ██████████ Esq.

Jane Doe II is likely to testify that she was brought to or invited to Defendant Epstein's home by his agent or employee to give him a massage wherein she was sexually assaulted by Defendant Epstein. She is also likely to testify that she was a minor when these events occurred.