

IN THE CIRCUIT COURT OF THE 15TH  
JUDICIAL CIRCUIT IN AND FOR PALM  
BEACH COUNTY FLORIDA

JANE DOE, by and through JANE DOE'S  
MOTHER, as parent and natural guardian

Case No: 50 2008 CA 006596 XXXX MB AB

Plaintiff,

vs.

JEFFREY EPSTEIN [REDACTED]

and [REDACTED]

Defendant.

*Please put  
in closed  
file. Jht*

**PLAINTIFF'S NOTICE OF TAKING VIDEO DEPOSITION DUCES TECUM**

PLEASE TAKE NOTICE THAT THE UNDERSIGNED ATTORNEY WILL TAKE THE DEPOSITION OF:

**NAME:**

Jeffrey Epstein  
c/o Burman, Critton, Luttier,  
& Coleman, LLP

**DATE AND TIME:**

December 29, 2008  
10:00 AM

**LOCATION:**

Atterbury, Goldberger, Weiss,  
[REDACTED]

upon an oral examination before a Notary Public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. The depositions are being taken for purposes of discovery, for use at trial or are being taken for such other purposes as are permitted under the Rules of the Court. Please have with you at that time:

1. All personal diaries for the years 2000 to the present.
2. All business and personal calendars for the years 2000 to the present.
3. All phone message books and personal phone books for the years 2000 to the present.
4. All phone messages for the years 2000 to the present.
5. Any items returned by the State Attorney, Palm Beach Police Department, or Federal authorities which were seized pursuant to warrant.
6. All photos, CD's which contain photographs of girls in any state of undress.
7. Any and all message books for the years 2000 to the present.
8. Any and all DVD's which contain photographs.
9. Any and all sex toys (including but not limited to vibrators, dildos, leather paraphernalia, whips, handcuffs, etc).
10. Bottles of massage oils, jelly or other massage paraphernalia.
11. Any and all tapes, DVD's or computer files which contain pornography that was located in your home or any computer under your control.

I HEREBY CERTIFY that a true and correct copy of this Notice was mailed this 25 day of November, 2008 to: [REDACTED] Jack A.

09/12/2019

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Agency to Agency Request: 19-411

**CONFIDENTIAL**

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Goldberger, Esq., [REDACTED] Bruce E.  
Reinhart, Esq., [REDACTED] Michael R. Tein, Esq., [REDACTED]  
[REDACTED] Douglas M. McIntosh, Esq., Jason A. McGrath,  
Esq., [REDACTED] Robert Critton, Esq.,  
Burman, Critton, Luttier & Coleman, LLP [REDACTED]

LEOPOLD-KUVIN, P.A.

[REDACTED]

By: \_\_\_\_\_

  
SPENCER L. KUVIN, ESQ.  
Florida Bar No: 089737