

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80811-CIV-MARRA/JOHNSON

[REDACTED]

Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]

[REDACTED]

Defendants.

**PLAINTIFF'S NOTICE OF SERVING
SECOND AMENDED ANSWERS TO INTERROGATORIES**

COMES NOW the Plaintiff, [REDACTED], by and through undersigned counsel, and hereby files this Notice with the Court that Second Amended Answers to Interrogatories propounded by the Defendant, JEFFREY EPSTEIN, on January 16, 2009, have been furnished to the attorney for the Defendant.

I HEREBY CERTIFY that a true copy of the foregoing has been furnished by e-mail this 25th day of October, 2009, to See attached list of counsel.

[REDACTED]

Attorney for Plaintiff(s)

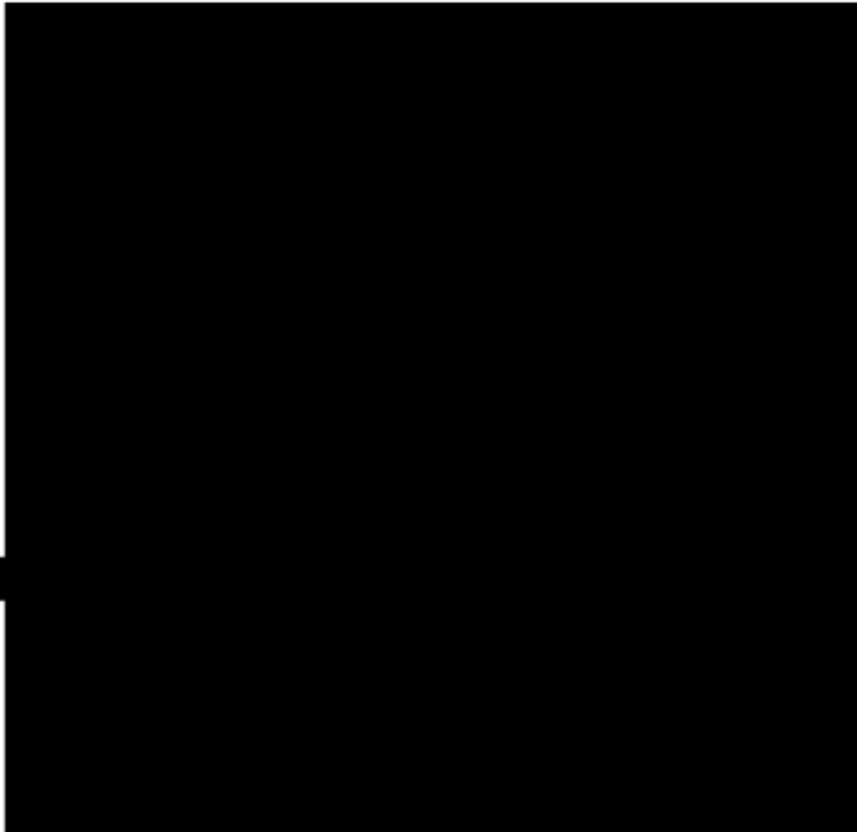


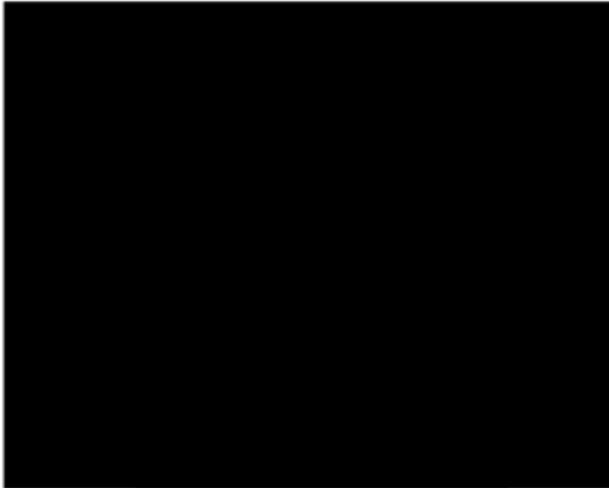
SUBJECT TO PROTECTIVE ORDER PARAGRAPHS 7, 8, 9, 10, 15, and 17

PLAINTIFF'S NOTICE OF SERVING
SECOND AMENDED ANSWERS TO INTERROGATORIES

3. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years, the dates you lived at each address, your Social Security number, your date of birth, and, if you are or have ever been married, the name of your spouse or spouses. List any children by name, date of birth and the father's name and address. List the names and address of your parents and any brother or sister.

ANSWER

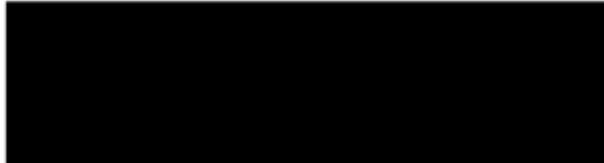




5. Please provide the name, address, telephone number, place of employment and job title of any person who has, claims to have or whom you believe may have knowledge or information pertaining to any fact alleged in the pleadings (as defined in Federal Rule of Civil Procedure 7(a) filed in this action, or any fact underlying the subject matter of this action).

ANSWER

1. █
c/o her attorneys:



Subject matter: Plaintiff.

█ vs. Epstein, et al.
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON
Plaintiff's Second Amended Answers to Defendant's First Interrogatories

2. Jeffrey Epstein
c/o his attorneys:

Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP

█

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.

█

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.

█

Subject matter: Defendant

3. █'s mother, █ and her brother, █
c/o █'s attorneys:

█

Subject matter: █'s involvement with Epstein.

4. █
(Address unknown)

Subject matter: Defendant.
5. Jane Doe (Case No.: 1:93-cv-01109-KAM)
c/o her attorney:

Theodore Leopold, Esquire
Leopold, Kuvin, P.A.
█

Subject matter: Victim of Epstein.
6. Jane Doe (Case No.: 502008CA020614)
c/o her attorney:

Isidro M. Garcia, Esquire
The Law Office of Brad Edwards & Associates, LLC
█

Subject matter: Victim of Epstein.
7. Jane Doe #2 (Case No.: 9:08-cv-80119-KAM)
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
█

Subject matter: Victim of Epstein.
8. Jane Doe #3 (Case No.: 9:08-cv-80232-KAM)
c/o her attorney:

█ vs. Epstein, et al.
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON
Plaintiff's Second Amended Answers to Defendant's First Interrogatories

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.

█

Subject matter: Victim of Epstein.

9. Jane Doe #5 (Case No.: 9:08-cv-80381-KAM)
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.

█

Subject matter: Victim of Epstein.

10. Jane Doe #4 (Case No.: 9:08-cv-80380-KAM)
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.

█

Subject matter: Victim of Epstein.

11. Jane Doe (Case No.: 9:08-cv-80804-KAM)
c/o her attorney:

Theodore Leopold, Esquire
Leopold, Kuvín, P.A.

█

Subject matter: Victim of Epstein.

█ vs. Epstein, et al.
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON
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12. Jane Doe █ (Case No.: 9:08-cv-80993-KAM)
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.

█

Subject matter: Victim of Epstein.

13. █ (Case No.: 502008CA025129XXXXMB AI)
c/o her attorneys:

Jack Scarola, Esquire
Jack P. Hill, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.

█

Subject matter: Victim of Epstein.

14. Jose Alessi
(Address unknown at this time)

Subject matter: Jeffrey Epstein's Butler.

15. █
Palm Beach Police Department

█

Subject matter: Investigator.

16. **Lanaa Belohavek**
Palm Beach County Prosecutors Office

████████████████████
████████████████████

Subject matter: Prosecutor.

17. **Detective ████████, lead investigator**
Palm Beach Police Department

████████████████████
████████████████████

Subject matter: Investigator.

18.

████████████████████
████████████████████

Subject matter: Former boyfriend of a victim of Epstein.

19. **Sgt. ██████**
Palm Beach Police Department

████████████████████
████████████████████

Subject matter: Investigator.

20.

████████████████████
████████████████████

Subject matter: Plaintiff's former boyfriend.

21. ██████████ **supervisor**

████████████████████
████████████████████

█

Subject matter: The incident which is the subject matter of this lawsuit. Discovery is ongoing.

22. Major █
Palm Beach County Sheriff's Office

█

Subject matter: Investigator.

23. █, friend of █
(Address will be provided upon receipt)

Subject matter: Victim and friend of █

24. Ghislane Maxwell c/o Ghislane Corp.

█

Subject matter: Associate of Epstein.

25. █

26. Detective █
Palm Beach Police Department

█

Subject matter: Investigator.

27. Chief █
Palm Beach Police Department

█

█

Subject matter: Investigator.

28. █
(Address unknown at this time)

Subject matter: Associate of Epstein who facilitated introductions with various victims.

29. Alfredo Rodriguez
(Address unknown at this time)

Subject matter: Employee of Epstein.

30. Detective █
Palm Beach Police Department

█

Subject matter: Investigator

31. █ Esquire
First Assistant U.S. Attorney
U.S. Dept. of Justice

█

Subject matter: Federal prosecutor.

32. █ M.S.W.
Federal Bureau of Investigation

█

Subject matter: Investigator.



15. List all dates you allege you were at Mr. Epstein's home in Florida, include date, time arrived and left, the name(s) of anyone who went with you to the home when you were there, the time spent with Mr. Epstein and the name(s) and address of any individuals who were present in the home with Mr. Epstein and you.

ANSWER

From May or June of ██████████ to August of ██████████ I went to Mr. Epstein's home on average 2 times a week. There were weeks when I would go 4 times a week. All my visit dates were maintained by Jeffrey Epstein and his staff in a phone message book kept on a table by the phone in the kitchen.

Please refer to #5 above and #16 below.

Discovery is ongoing.

16. State in detail how you came to be at Mr. Epstein's home on each occasion, i.e. did someone bring you or ask you if you would or wanted to go; if so, state the name and address of that individual and what he/she told you and the purpose of your visit.

ANSWER

I was introduced to Jeffrey Epstein by my friend ██████████ in ██████████. I was to give Jeffrey Epstein a massage. I continued to provide massages up until August of ██████████. I was transported to Jeffrey Epstein's house by Yellow Cab, provided by Jeffrey Epstein, ██████████, my ex-boyfriend ██████████, my mother ██████████ and my brother ██████████. I was also transported via private car provided by Jeffrey Epstein.



(Address will be provided upon receipt)

██████ vs. Epstein, et al.
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23. State the names, addresses, ages, phone numbers and dates of all females whom you claim were brought by you to Mr. Epstein's home to give him a massage or for any other reason. As to each female, state the amount of money you claim you were paid to bring each female.

ANSWER

████████████████████ Age: 22
West Palm Beach, FL.
I was paid \$100.00

████████████████████ (last name unknown)
(Address unknown)
I was paid \$100.00

████████████████████
(Address unknown)
I was paid \$100.00

██████ vs. Epstein, et al.
Case No.: 08-CV-80811-CIV-MARRA/JOHNSON
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Signature of Answering Party

STATE OF Florida)

COUNTY OF Palm Beach)

The foregoing instrument was acknowledged before me this ____ day of February, 2009 by ██████████ who is personally known to me or who has produced _____ (type of identification) as identification and who did/did not take an oath.

Notary Public
State of Florida at Large
My Commission expires:
Commission No:

██████████ vs. Epstein, et al.
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Plaintiff's Second Amended Answers to Defendant's First Interrogatories

COUNSEL LIST

Jack A. Goldberger
Atterbury, Goldberger & Weiss, P.A.



Attorneys for Jeffrey Epstein

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.



Attorneys for ██████████

Robert Critton
Burman Critton Luttier & Coleman LLP



Attorneys for Jeffrey Epstein



Attorneys for Party

VERIFICATION

[REDACTED] being duly sworn, deposes and says that the foregoing answers to interrogatories are true and correct to the best of her knowledge, information and belief.

[REDACTED]

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this 26 day of October, 2009 by [REDACTED] who is personally known to me or has produced the following identification _____



(SEAL)

MICHAEL DANCHUK
Notary - Print Name

[Signature]
Notary - Signature

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