

LSS

**U.S. District Court
Southern District of Florida (West Palm Beach)
CIVIL DOCKET FOR CASE #: 9:08-cv-80811-KAM**

█ v. Epstein et al
Assigned to: Judge Kenneth A. Marra
Cause: 28:1332 Diversity

Date Filed: 07/21/2008
Jury Demand: Plaintiff
Nature of Suit: 360 P.I.: Other
Jurisdiction: Diversity

Plaintiff

█

represented by **Richard Horace Willits**
Richard H Willits PA
2290 10th Avenue North
Suite 404
Lake Worth, FL 33461
█
Fax: █
Email: █
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

Jeffrey Epstein

represented by **Bruce Reinhart**
Bruce E. Reinhart, P.A.
250 S. Australian Avenue
Suite 1400
West Palm Beach, FL 33401
█
Fax: █
Email: █
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Guy Alan Lewis
Lewis Tein
3059 Grand Avenue
Suite 340
Coconut Grove, FL 33133
█
Fax: 442-6744
Email: █
LEAD ATTORNEY

*ATTORNEY TO BE NOTICED***Jack Alan Goldberger**

Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

Fax: 835-8691

Email: [REDACTED]

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED***Michael Ross Tein**

Lewis Tein
3059 Grand Avenue
Suite 340
Coconut Grove, FL 33133

Fax: 442-6744

Email: [REDACTED]

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED***Michael James Pike**

Burman Critton Luttier & Coleman
515 N Flagler Drive
Suite 400
West Palm Beach, FL 33401-2918

Fax: 515-3148

Email: MPike@bclclaw.com

*ATTORNEY TO BE NOTICED***Robert Dewese Critton, Jr.**

Burman Critton Luttier & Coleman
515 N Flagler Drive
Suite 400
West Palm Beach, FL 33401-2918

Fax: [REDACTED]

Email: [REDACTED]

*ATTORNEY TO BE NOTICED***Defendant**

[REDACTED]

represented by **Bruce Reinhart**
(See above for address)

*LEAD ATTORNEY**ATTORNEY TO BE NOTICED*

Guy Alan Lewis
 (See above for address)
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Jack Alan Goldberger
 (See above for address)
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

Michael Ross Tein
 (See above for address)
 LEAD ATTORNEY
 ATTORNEY TO BE NOTICED

| Date Filed | # | clear | Docket Text |
|------------|----------|--------------------------|---|
| 07/21/2008 | <u>1</u> | <input type="checkbox"/> | NOTICE OF REMOVAL Filing fee \$350 Receipt#: 724505, filed by Jeffrey Epstein, ██████████. (rb) (Entered: 07/21/2008) |
| 07/22/2008 | <u>2</u> | <input type="checkbox"/> | ORDER of Instructions. Signed by Judge William J. Zloch on 7/22/2008. (bc) (Entered: 07/22/2008) |
| 07/25/2008 | <u>3</u> | <input type="checkbox"/> | MOTION for Hearing <i>Defendants' Request for Oral Argument</i> by Jeffrey Epstein, ██████████. (Tein, Michael) (Entered: 07/25/2008) |
| 07/25/2008 | <u>4</u> | <input type="checkbox"/> | MOTION for Extension of Time to File Answer <i>Defendants Motion for Enlargement of Time to Answer or Otherwise Respond to Complaint</i> by Jeffrey Epstein, ██████████. (Tein, Michael) (Entered: 07/25/2008) |
| 07/25/2008 | <u>5</u> | <input type="checkbox"/> | NOTICE by Jeffrey Epstein, ██████████ <i>Notice of Related Actions</i> (Tein, Michael) (Entered: 07/25/2008) |
| 07/25/2008 | 6 | | Sealed Document. (igo) (Entered: 07/25/2008) |
| 07/25/2008 | 7 | | Sealed Document. (igo) (Entered: 07/25/2008) |
| 07/29/2008 | <u>8</u> | <input type="checkbox"/> | ORDER denying without prejudice <u>4</u> Motion for Extension of Time to Respond to Complaint. Signed by Judge William J. Zloch on 7/28/2008. (bc) (Entered: 07/29/2008) |
| 07/30/2008 | <u>9</u> | <input type="checkbox"/> | MOTION for Extension of Time to File Answer <i>Defendants' Renewed Motion for Enlargement of Time to Answer or Otherwise Respond to Complaint</i> by Jeffrey Epstein, ██████████ (Attachments: # <u>1</u> Text of Proposed Order Proposed Order)(Tein, Michael) (Entered: 07/30/2008) |
| 07/30/2008 | 10 | | PAPERLESS ORDER denying <u>3</u> Motion for Hearing. Signed by Judge William J. Zloch on 7/30/2008. (bc) (Entered: 07/30/2008) |
| 08/06/2008 | 11 | | PAPERLESS ORDER granting <u>9</u> Motion for Extension of Time to Respond to Complaint. Signed by Judge William J. Zloch on 8/6/2008. (bc) (Entered: 08/06/2008) |

| | | | |
|------------|-----------|--------------------------|--|
| 08/07/2008 | <u>12</u> | <input type="checkbox"/> | MOTION to Reassign Case <i>TO JUDGE KENNETH MARRA</i> by [REDACTED]. (Willits, Richard) (Entered: 08/07/2008) |
| 08/07/2008 | <u>13</u> | <input type="checkbox"/> | MEMORANDUM in Opposition re 6 Sealed Document, 7 Sealed Document <i>TO MOTION TO STAY</i> filed by [REDACTED] (Willits, Richard) (Entered: 08/07/2008) |
| 08/14/2008 | <u>14</u> | | PAPERLESS ORDER denying <u>12</u> Motion to Reassign Case. Signed by Judge William J. Zloch on 8/14/2008. (bc) (Entered: 08/14/2008) |
| 08/18/2008 | <u>15</u> | <input type="checkbox"/> | MOTION for Extension of Time to File Reply <i>Defendants' Motion for An Enlargement of Time to File Reply Under Seal Because of Tropical Storm Fay</i> by Jeffrey Epstein, [REDACTED] (Attachments: # <u>1</u> Text of Proposed Order)(Tein, Michael) (Entered: 08/18/2008) |
| 08/18/2008 | <u>16</u> | <input type="checkbox"/> | SCHEDULING REPORT- Rule 26(f). (Tein, Michael) (Entered: 08/18/2008) |
| 08/20/2008 | <u>17</u> | | Sealed Document. (rb) (Entered: 08/20/2008) |
| 08/25/2008 | <u>18</u> | | PAPERLESS ORDER granting <u>15</u> Motion for Extension of Time to Respond. Signed by Judge William J. Zloch on 8/25/2008. (bc) (Entered: 08/25/2008) |
| 08/27/2008 | <u>19</u> | <input type="checkbox"/> | NOTICE by Jeffrey Epstein <i>Notice of Appearance</i> (Pike, Michael) (Entered: 08/27/2008) |
| 08/28/2008 | | | Clerks Notice of Docket Correction and Instruction to Filer re <u>19</u> Notice (Other) filed by Jeffrey Epstein. Error - Wrong Event Selected ; Correction - Redocketed by Clerk as NOTICE of Attorney Appearance. Instruction to Filer - In the future, please select the proper event. It is not necessary to refile this document. (ail) (Entered: 08/28/2008) |
| 08/28/2008 | <u>20</u> | | NOTICE of Attorney Appearance by Michael James Pike, Robert Dewese Critton, Jr on behalf of Jeffrey Epstein. Redocketed SEE Image <u>19</u> (ail) (Entered: 08/28/2008) |
| 09/03/2008 | <u>21</u> | <input type="checkbox"/> | ORDER REASSIGNING CASE. Case reassigned to Judge Kenneth A. Marra for all further proceedings. Judge William J. Zloch no longer assigned to case. Signed by Judge William J. Zloch on 8/29/2008. (tb) (Entered: 09/03/2008) |
| 09/06/2008 | <u>22</u> | <input type="checkbox"/> | MOTION to Preserve Evidence by [REDACTED]. (Willits, Richard) (Entered: 09/06/2008) |
| 09/06/2008 | <u>23</u> | | MOTION to Expedite certain discovery by [REDACTED]. (see image <u>22</u>) (tb) (Entered: 09/09/2008) |
| 09/09/2008 | | | Clerks Notice of Docket Correction and Instruction to Filer re <u>22</u> MOTION to Preserve Evidence filed by [REDACTED] A.. Error - Motion with Multiple Reliefs Filed as One Relief ; Correction - Additional relief(s) <u>23</u> docketed by Clerk. Instructions to filer - In the future, please select all applicable reliefs. It is not necessary to refile this document. (tb) (Entered: 09/09/2008) |

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|------------|----|--------------------------|---|
| 09/15/2008 | 24 | <input type="checkbox"/> | ORDER denying in part 22 Motion to Preserve Evidence; granting in part 23 Motion to Expedite. Signed by Judge Kenneth A. Marra on 9/14/08. (ir) (Entered: 09/15/2008) |
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| Billable Pages: | 3 | Cost: | 0.24 |

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

NO. 08-80811-CIV-MARRA/JOHNSON

[REDACTED]
Plaintiff,

v.

JEFFREY EPSTEIN
and [REDACTED]

Defendants.

ORDER

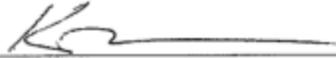
THIS CAUSE comes before the Court on Plaintiff's Motion to Preserve Evidence and Expedite Certain Discovery (DE 22), filed September 6, 2008. Plaintiff represents that Defendants have not agreed to the relief requested in this motion on the basis that Defendants believe the motion is moot because of another order recently entered by the Court in *Doe I v. Epstein*, NO. 08-80804-CIV-MARRA. The Court has carefully considered the motion and is otherwise fully advised in the premises.

It is **ORDERED AND ADJUDGED** that Plaintiff's Motion (DE 22) is **GRANTED IN PART**. Defendants are directed to provide duplicates of all evidence subject to this Court's protective order in *Doe I v. Epstein*, No. 08-80804-CIV-MARRA (Sept. 5, 2008) to Plaintiff should said evidence be returned to Defendants by the State of Florida. Plaintiff's Motion is **DENIED IN PART AS MOOT** as to the request to preserve evidence since the evidence in

question is already subject to a protective order issued by this Court.

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County,

Florida, this 14th day of September, 2008.



KENNETH A. MARRA
United States District Judge

Copies to:
all counsel of record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

C.M.A.
PLAINTIFF

vs.

JEFFREY EPSTEIN and
[REDACTED]
DEFENDANTS

**PLAINTIFF'S MOTION TO PRESERVE EVIDENCE
AND EXPEDITE CERTAIN DISCOVERY
WITH INCORPORATED MEMORANDUM**

Plaintiff [REDACTED], moves, pursuant to Rules 26 and 34 to Preserve Evidence and Expedite the Discovery of this Evidence and states:

1. Defendants removed this action to federal court.
2. This case was recently reassigned to this division by the Honorable William Zloch.
3. This is one of several cases pending in this division which alleges sexual abuse of a female minor by the defendant JEFFREY EPSTEIN.
4. It has come to the attention of the undersigned that Defendant JEFFREY EPSTEIN filed a Motion with the Florida State Court to return the evidence seized at his home in conjunction with his criminal prosecution. With respect to the details of EPSTEIN's motion, Plaintiff respectfully requests this court to take

judicial notice of a similar motion and its attachments filed at Docket Entry 12 in the separate case filed in this court by the name of JANE DOE, a/k/a. JANE DOE NO. 1 v. JEFFREY EPSTEIN et al. Case NO. 08-80804-CIV-MARRA/JOHNSON

5. This evidence is relevant and critical to the prosecution of not only the instant claim, but for other suits filed against Defendant EPSTEIN, including but not limited to the Florida RICO claims filed in State Court.

6. As stated in the certificate, the undersigned has conferred with counsel for EPSTEIN. They take the position that this motion would be moot because of an order recently entered in JANE DOE, a/k/a. JANE DOE NO. 1 v. JEFFREY EPSTEIN et al. Case NO. 08-80804-CIV-MARRA/JOHNSON. However, [REDACTED] respectfully believes that an enforceable order is needed in this particular case. In addition, she requests a more detailed order which includes all of the numerous law firms representing the defendants EPSTEIN and [REDACTED]

WHEREFORE, Plaintiff respectfully request the Court grant her Motion to Preserve of all the seized Evidence identified in the Palm Beach Police Department Property Receipt attached to the Motion to Preserve Evidence filed at Docket Entry #12 in the case of JANE DOE, a/k/a. JANE DOE NO. 1 v. JEFFREY EPSTEIN et al. Case NO.08-80804-CIV-MARRA/JOHNSON should it be Returned to EPSTEIN by the State Court, and expedite the duplication of this evidence immediately upon its return, in advance of any Rule 26 conference.

MEMORANDUM OF LAW

Pursuant to Rules 26, 30 and 34, of the Federal Rules of Civil Procedure, this court has the authority to modify the normal time limitations under the Rules. *See AT&T Mobility LLC v. Dynamic Cellular Corp.*, 2008 WL 2139518 (S.D. Fla. 2008); *see also Trac/one Wireless, Inc. v. King Trading, Inc.*, 2008 WL 918243 (N.D. Tex. 2008). Additionally, when there is a good faith belief that evidence may be lost the Court has the authority to enter an Order preserving such evidence. *Id.* at 1. An injunction is not required nor are the elements of an injunction necessary before entering an Order preserving such evidence. *Id.* at 2.

Given that Defendant EPSTEIN has plead guilty and is currently serving a year in jail based on the charges which form the foundation Plaintiffs (and many other Plaintiffs') claims, it is reasonable to assume the State's seized evidence is extremely harmful to Defendant EPSTEIN.

As a result, without a Protective Order Defendant EPSTEIN has no reason to keep or maintain this negative evidence; Plaintiff has put Defendant EPSTEIN on notice that this evidence is relevant to the instant action and any destruction could potentially constitute spoliation. If this evidence were destroyed Plaintiff would be severely prejudiced.

Dated: September 6, 2008

Respectfully submitted,

By: s/Richard H. Willits

Richard H. Willits (FL Bar No. 139888) [REDACTED]

RICHARD H. WILLITS, P.A.

2290 10th Ave. North, Suite 404

Attorney for Plaintiff [REDACTED]

Tel: [REDACTED] Fax: 561-582-7600

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1

I hereby certify that I conferred with opposing counsel by telephone on August 7, 2008 concerning a good faith effort to resolve the Motion to Stay, and they oppose the motion on the ground that it would be moot.

s/Richard H. Willits

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2008, 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 to 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 Notices of Electronic Filing.

s/Richard H. Willits

SERVICE LIST

Michael Tein, Esq. - [REDACTED]

Jack Goldberger, Esq. [REDACTED]

Bruce Reinhart, Esq. - [REDACTED]

Michael Pike, Esq.

Robert Critton, Esq.

July 21, 2008

STEVEN M. LARIMORE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: _____

C.M.A., **08-80811-Civ-ZLOCH/SNOW**

Plaintiff,

vs.

JEFFREY EPSTEIN and
[REDACTED],

Defendants.
_____ /

NOTICE OF REMOVAL

In accordance with 28 U.S.C. §§ 1441, 1446, and 1332(a)(1), the defendants, Jeffrey Epstein and [REDACTED], hereby remove this action¹ from Palm Beach County Circuit Court to the United States District Court for the Southern District of Florida, and respectfully state as follows:

- 1. This case is within the original jurisdiction of this Court.**

This case is properly removable because it falls within the original jurisdiction of the United States District Court for the Southern District of Florida. See 28 U.S.C. § 1332(a)(1) (establishing that federal district courts have original

¹ [REDACTED] v. *Epstein et al.*, Case No. 50 2008 CA 005240 XXXX MB (Fla. 15th Cir. Ct. filed Feb. 21, 2008).

Lewis Tein, P.A.
ATTORNEYS AT LAW

3059 GRAND AVENUE, SUITE 340, COCONUT GROVE, FLORIDA 33133

jurisdiction over cases where the amount “in controversy [is more than \$75,000] . . . and [when the controversy] is between citizens of different states”).

2. The amount in controversy in this action exceeds \$75,000.

The Complaint contains a generic prayer for relief.² It is clear, however, that the plaintiff seeks more than \$75,000 in damages. This case seeks damages in connection with alleged sexual misconduct. (Compl. ¶¶ 6–7.) The Complaint alleges that [REDACTED] has “suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.” (Compl. ¶ 9.) These are serious allegations. *Cf., e.g., Woods v. Southwest Airlines, Co.*, 523 F. Supp. 2d 812, 820 (N.D. Ill. 2007) (determining, in the context of diversity jurisdiction, that the \$75,000 threshold had been satisfied, and “clearly [surpassed],” based on “the nature of the injuries alleged” in the complaint); *see also Williams v. Best Buy Co., Inc.*, 269 F.3d 1316, 1319 (11th Cir. 2001) (“When [a] complaint does not claim a specific amount of damages, removal from state court is proper if it is facially apparent from the complaint that the amount in controversy exceeds the jurisdictional requirement.”).

² The Complaint seeks damages for “[more than] . . . \$15,000.” (Compl. ¶ 1.) This boilerplate is routinely used in Florida pleading practice to trigger application of section 26.012, Florida Statutes, the statute that establishes the jurisdictional amount required for filing in Florida’s Circuit Court (as opposed to County Court).

Further, the allegations by this plaintiff are virtually identical to allegations made in four separate civil actions, filed by four different plaintiffs, against Mr. Epstein in federal court.³ In each of those actions, the plaintiffs are seeking damages in excess of \$50 million - - well over the \$75,000 amount-in-controversy requirement for diversity jurisdiction. *See Jane Doe No. 2* at D.E. 1 ¶ 4; *Jane Doe No. 3* at D.E. 1 ¶ 4; *Jane Doe No. 4* at D.E. 1 ¶ 4; *Jane Doe No. 5* at D.E. 1 ¶ 4.

3. There is complete diversity.

Diversity jurisdiction requires complete diversity. *Carden v. Arkoma Assocs.*, 494 U.S. 185, 187 (1990) (“Since its enactment, we have interpreted the diversity statute to require ‘complete diversity’ of citizenship.” (citing *Strawbridge v. Curtiss*, 7 U.S. (3 Cranch) 267, 267–68 (1806))); *see also MacGinnitie v. Hobbs Group, LLC*, 420 F.3d 1234, 1239 (11th Cir. 2005) (stating that “[c]omplete diversity requires that no defendant in a diversity action be a citizen of the same state as any plaintiff”). As demonstrated below, this case satisfies the statutory requirement of complete diversity.

(a) Plaintiff [REDACTED] is a citizen of Florida. (Compl. ¶ 2.)

³ *See Jane Doe No. 2 v. Jeffrey Epstein*, No. 08-CV-80119-KAM (S.D. Fla. filed Feb. 6, 2008); *Jane Doe No. 3 v. Jeffrey Epstein*, No. 08-CV-80232-KAM (S.D. Fla. filed Mar. 5, 2008); *Jane Doe No. 4 v. Jeffrey Epstein*, No. 08-CV-80380-KAM (S.D. Fla. filed Apr. 14, 2008); *Jane Doe No. 5 v. Jeffrey Epstein*, No. 08-80381-CV-KAM (S.D. Fla. filed Apr. 14, 2008).

- (b) While the Complaint suggests that Mr. Epstein might be a citizen of New York or Florida, he is, in fact, a citizen of the U.S. Virgin Islands. (Epstein Aff. Ex. A.)⁴
- (c) Contrary to the allegations in the Complaint, Defendant [REDACTED] is a citizen of New York, not Florida. ([REDACTED] Stmt. Ex. B.)

4. This Notice satisfies the procedural requirements of 28 U.S.C. § 1446.

First, in accordance with 28 U.S.C. § 1446(b), this Notice is timely. Only defendant Epstein has been served with process. Defendant [REDACTED] has not yet been served. *See Hill Dermaceuticals, Inc. v. RX Solutions, United Health Group, Inc.*, No. 6:08-cv-330-Orl-31KRS, 2008 WL 1744794, at *3 (M.D. Fla. Apr. 11, 2008) (concluding that removal petition was timely where it was filed within 30 days after the last defendant was served).

Second, in accordance with section 1446(d), defendants have served this Notice of Removal on July 21, 2008.

Third, in accordance with section 1446(b), all of the defendants join this Petition and consent to removal.

⁴ District courts may consider affidavits and other evidence to support removal jurisdiction. *See Sierminski v. Transouth Fin. Corp.*, 216 F.3d 945, 949 (11th Cir. 2000).

5. The State Court docket has been filed.

All papers filed in the State Court are attached to this Removal Petition.

Conclusion

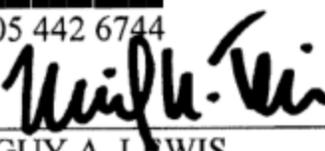
Because this is a civil action between citizens of different states, excluding any fraudulently joined parties, and the amount in controversy exceeds \$75,000, exclusive of interests and costs, this Court has original jurisdiction over this action pursuant to 28 U.S.C. § 1332(a)(1).

WHEREFORE, the defendants, Jeffrey Epstein and [REDACTED], remove this case from Palm Beach Circuit Court to the United States District Court for the Southern District of Florida.

Respectfully submitted,

LEWIS TEIN, P.L.
3059 Grand Avenue, Suite 340
Coconut Grove, Florida 33133
Tel: [REDACTED]
Fax: 305 442 6744

By:


GUY A. LEWIS

Fla. Bar No. 623740
[REDACTED]

MICHAEL R. TEIN
Fla. Bar No. 993522
[REDACTED]

ATTERBURY, GOLDBERGER & WEISS, P.A.
250 Australian Avenue South, Suite 1400
West Palm Beach, Florida 33401

Tel. [REDACTED]
Fax. [REDACTED]

By: Jack A. Goldberger
Fla. Bar No. 262013
[REDACTED]

Attorneys for Defendant Jeffrey Epstein

BRUCE E. REINHART, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, Florida 33401

Tel. [REDACTED]
Fax. [REDACTED]

By: Will H. Tein FOR
Bruce E. Reinhart
Fla. Bar No. 10762
[REDACTED]

Attorneys for Defendant [REDACTED]

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document is being served this day,
July 21, 2008, on counsel of record identified on the service list by U.S. Mail.

Will H. Tein
Michael R. Tein

Service List

Richard H. Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, Florida 33461
Fax: [REDACTED]
Counsel for Plaintiff C.M.A.

EXHIBIT A

AFFIDAVIT OF JEFFREY EPSTEIN

I, Jeffrey Epstein, being duly sworn, do depose and state as follows:

1. My name is Jeffrey Epstein, and I am over 18 years of age and otherwise competent to testify.
2. I am a citizen and resident of the U.S. Virgin Islands.
3. My permanent address is in the U.S. Virgin Islands.

FURTHER AFFIANT SAYETH NAUGHT.



JEFFREY EPSTEIN

Sworn before me this 19 day of July 2008



Notary Public
State of Florida
My commission expires:

NOTARY PUBLIC-STATE OF FLORIDA
 Michael R. Tein
Commission # DD581058
Expires: AUG. 03, 2010
BONDED THRU ATLANTIC BONDING CO., INC.

EXHIBIT B

STATEMENT OF [REDACTED]

I, [REDACTED] state as follows, based on my personal knowledge:

1. I am over 18 years of age and otherwise competent to testify.
2. I am a citizen and resident of New York, New York.
3. My permanent address is in New York, New York.
4. I have not resided in Florida at any time during the pendency of *Jane*

Doe v. Jeffrey Epstein, Case No. 50 2008 CA 00656 XXXX MB AB, including upon the removal of that case to federal court.

PURSUANT TO 28 U.S.C. § 1746, I STATE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON: JULY 19, 2008.

[REDACTED]

STATE COURT PLEADINGS

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

SD 2008 CA 005240 XXXX MB AF

██████████
Plaintiff,

vs.

JEFFREY EPSTEIN, and ██████████
Defendants.

COMPLAINT

Plaintiff, ██████████ sues the Defendants, JEFFREY EPSTEIN and ██████████ and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff, C.M.A. was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently twenty-one years old.
3. The Plaintiff is unsure of the residency of defendant JEFFREY EPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The defendant, ██████████ was a resident of Florida.

COUNT I

5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

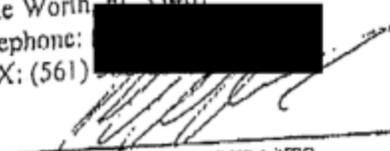
11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by [REDACTED] who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:

- a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
- b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
- c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
- d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
- e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.

12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST SARAH [REDACTED] IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

RICHARD H. WILLITS, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Telephone: [REDACTED]
FAX: (561) [REDACTED]

By: 
RICHARD H. WILLITS
Florida Bar No.: 139888

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

502008 CA 00524 U XXXX MB AF
CASE NO.: _____
JUDGE: _____

Plaintiff,

vs.

JEFFREY EPSTEIN, and _____
Defendants.

II. TYPE OF CASE (Place an X in one box only. If the case fits more than one type of case, select the most definitive.)

DOMESTIC RELATIONS

- Simplified dissolution
- Dissolution
- Support -IV-D
- Support - Non IV-D
- URESA -IV-D
- URESA-Non IV-D
- Domestic Violence
- Other Domestic Relations

TORTS

- Professional Malpractice
- Products Liability
- Auto Negligence
- Other Negligence

OTHER CIVIL

- Contracts
- Condominium
- Real Property/
Mortgage
Foreclosure
- Eminent
Domain
- Other

III. Is Jury Trial Demanded in Complaint?

- YES
- NO

DATE: 2-15-08

RICHARD H. WILLITS, P.A.
2290 10TH Avenue North, Suite 404
Lake Worth, FL 33461
Attorney for Plaintiff

RICHARD H. WILLITS
Florida Bar #: 139888

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

[REDACTED]

Plaintiff,

502008 CA 005240 XXXX MBAA

vs.

JEFFREY EPSTEIN, and [REDACTED]
Defendants.

SUMMONS

TO DEFENDANT: JEFFREY EPSTEIN or 9 East 71st Street
358 El Brillo Way Palm Beach, FL 33480 New York, NY 10021

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the Court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461
[REDACTED]

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on FEB 25 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4667
West Palm Beach, Florida
33402-4667
CLERK OF THE COURT

(SEAL)



Sheri Paige
AS DEPUTY CLERK
SHERI PAIGE

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IMPORTANTE

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IF YOU ARE A PERSON WITH A DISABILITY WHICH NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADA COORDINATOR IN THE ADMINISTRATIVE OFFICE OF THE COURT, PALM BEACH COUNTY COURTHOUSE, 205 NORTH DIXIE HIGHWAY, ROOM 5.2500, WEST PALM BEACH, FL 33401; TELEPHONE NUMBER 561-355-2431 WITHIN TWO (2) WORKING DAYS OF YOUR RECEIPT OF THIS SUMMONS; IF YOU ARE HEARING/VOICE IMPAIRED, CALL 1- [REDACTED].

SI OU SE YON MOUN KI INFIM, KI BENZWEN NINPOT AKOMODASYON POU KA PATISIPE NAN PWOSE SA-A, OU GEN DWA, SANL PA KOUTEW ANYIN, POU YO BAW KEK SEVIS. TANPRI KONTAKTE KOODINATE ADA, NAN BIRO ADMINISTRATIF TRIBINAL NAN COTE PALM BEACH, FLORIDA LA, KI NAN 205 NORTH DIXIE HIGHWAY, CHAM 5.2500, WEST PALM BEACH, FLORIDA 33401, NIMERO TELEFONN - NAN SE [REDACTED]. RELE DE (2) JOU DE LE OU RESEVWA CITATION; SI OU BEBE OU BYEN SOUD RELE 1- [REDACTED].

SI UD, ES UNA PERSONA INCAPCITADA QUE NECESITA DE UN SERVICIO ESPECIAL PARA PARTICIPAR EN ESTE PROCESO, UD. TIENE DERECHO A QUE LE PROVEAN CIERTA AYUDA SIN COSTO ALUGNO. POR FAVOR PONGASE EN CONTACTO EL COORDINATR DE LA OFICINA ADMINSTRATIVA DE LA CORTE ADA, SITUADA EN EL 205 NORTH DIXIE HIGHWAY, OFICINA 5.2500, WEST PALM BEACH, FLORIDA 33401, TELEFONE [REDACTED], DENTRO DE LOS DOS (2) PROXIMOS DIAS HABILES DESPUES DE RECIBIR ESTA CITACION; SI TIENE INCAPACIDAD DE OIR O HABLAR LLAME AL 1- [REDACTED].

SI VOUS ESTES INFIRME, ET EN BESOIN DE NIMPORTE ACCOMMODATION POUR POURVOIR PARTICIPER A CES PROCEDURES, VOUS POUVEZ GRATUITEMENT RECEVOIR CERTAIN SERVICES. SIL-VOUS-PLAIT CONTACTEZ LE COORDINATEUR DU BUREAU ADMINISTRATIF DE TRIBUNAL DE PALM BEACH, LE TRIBUNAL SE TROUVE A 205 NORTH DIXIE HIGHWAY, CHAMBRE 5.2500, WEST PALM BEACH, FLORIDA 33401, NUMERO DE TELEPHONE [REDACTED] DURANT DEUX (2) JOURS SUTVANT LA RECEPTION DE CITATION; SI VOUS ETES MUETE OU SOURDS, APPELZ 1-800-955-8771.

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.: 2008CA005240 AF

[REDACTED]
Plaintiff,

vs.

JEFFREY EPSTEIN, and [REDACTED]
Defendants.

FILED
08 APR 11 PM 4:40
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 9

SUMMONS

TO DEFENDANT: [REDACTED]

or 9 East 71st Street
New York, NY 10021

IMPORTANT

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RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461
[REDACTED]

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on APR 17 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
CLERK OF THE COURT

(SEAL)



[Signature]
AS DEPUTY CLERK

MARY MCMILLAN

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4867
West Palm Beach, Florida

IMPORTANTE

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SI OU SE YON MOUN KI INFIM, KI BENZWEN NINPOT AKOMODASYON POU KA PATISIPE NAN PWOSE SA-A, OU GEN DWA, SANL PA KOUTEW ANYIN, POU YO BAW KEK SEVIS. TANPRI KONTAKTE KOODINATE ADA, NAN BIRO ADMINISTRATIF TRIBINAL NAN COTE PALM BEACH, FLORIDA LA, KI NAN 205 NORTH DIXIE HIGHWAY, CHAM 5.2500, WEST PALM BEACH, FLORIDA 33401, NIMERO TELEFONN - NAN SE [REDACTED] RELE DE (2) JOU DE LE OU RESEVWA CITATION; SI OU BEBE OU BYEN SOUD RELE 1-[REDACTED].

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

[REDACTED]

Plaintiff,

vs.

JEFFREY EPSTEIN, and
Defendants.

[REDACTED]

502008 CA 005240 XXXX MB@AF

SUMMONS

TO DEFENDANT: JEFFREY EPSTEIN
358 El Brillo Way or 9 East 71st Street
Palm Beach, FL 33480 New York, NY 10021

IMPORTANT

A lawsuit has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the Clerk of this Court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the Court to hear your side of the case. If you do not file your response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the Court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

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RICHARD H. WILLITS, ESQ.
Plaintiff/Plaintiff's Attorney
2290 10th Avenue North
Suite 404
Lake Worth, Florida 33461

[REDACTED]

FAX 561 588-8819

THE STATE OF FLORIDA

TO EACH SHERIFF OF THE STATE: You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above-named defendant.

DATED on FEB 25 2008, 2008

SHARON R. BOCK
Clerk & Comptroller
P.O. Box 4667
West Palm Beach, Florida
33402-4667
CLERK OF THE COURT

(SEAL)



Sheri Paige

AS DEPUTY CLERK

SHERI PAIGE

IMPORTANTE

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IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.:

██████████
Plaintiff,

SD2008 CA 005240 XXXX MB

AF
AF

vs.

JEFFREY EPSTEIN, and ██████████
Defendants.

COPY
RECEIVED FOR FILING
FEB 21 2008
SHARON R. BOCK
CLERK & COMPTROLLER
CIRCUIT CIVIL DIVISION

COMPLAINT

Plaintiff, ██████████, sues the Defendants, JEFFREY EPSTEIN and ██████████, and alleges:

1. This is an action for damages in excess of Fifteen Thousand Dollars (\$15,000.00), exclusive of costs and interest.
2. At all times material hereto, the Plaintiff ██████████ was and is a resident of Palm Beach County, Florida. Plaintiff is a female who is presently twenty-one years old.
3. The Plaintiff is unsure of the residency of defendant JEFFREY ESPSTEIN, because he has residences in New York, Florida, New Mexico, and also outside of the continental United States.
4. The defendant, ██████████ was a resident of Florida.

COUNT I

5. Plaintiff incorporates into this count the allegations of paragraphs 1 through 3.
6. On numerous occasions while the Plaintiff was a minor, beginning when she was fourteen, the defendant, JEFFREY EPSTEIN intentionally induced and/or seduced the Plaintiff into performing various acts of lewd and lascivious conduct and/or sexual performances in his presence. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
7. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN performed various acts of lewd and lascivious conduct in the presence of the Plaintiff. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
8. On numerous occasions while the Plaintiff was a minor, the defendant, JEFFREY EPSTEIN touched the Plaintiff's breasts and genitalia. These acts all took place at the mansion owned by the defendant JEFFREY EPSTEIN which was located in Palm Beach, Florida.
9. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST JEFFREY EPSTEIN, IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST, AND FURTHER DEMANDS TRIAL BY JURY.

COUNT II

10. Plaintiff incorporates into this count the allegations of paragraphs 1 through 4, and paragraphs 6 through 9.

11. For each and every occurrence of sexual abuse of the Plaintiff while she was a minor for which JEFFREY EPSTEIN was responsible, he was aided, assisted, and/or abetted by [REDACTED], who lived at the Palm Beach mansion of JEFFREY EPSTEIN. Said acts included, but were not limited to, the following:
- a. She often called the Plaintiff, when the Plaintiff was a minor, to arrange for the Plaintiff to come to the Palm Beach mansion of JEFFREY EPSTEIN, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - b. She observed the Plaintiff being brought to the Palm Beach mansion of JEFFREY EPSTEIN, when the Plaintiff was a minor, and sometimes escorted the Plaintiff to a room in that mansion where JEFFREY EPSTEIN was waiting, for the ostensible purpose of providing "massages" to JEFFREY EPSTEIN, when she knew or should have known that Plaintiff had no credentials to provide massage therapy.
 - c. She sometimes paid the Plaintiff for the "sessions" with JEFFREY EPSTEIN.
 - d. She made telephone calls to the Plaintiff, when the Plaintiff was a minor, to arrange for gifts to be sent to the Plaintiff.
 - e. She took photographs of the Plaintiff, when the Plaintiff was a minor, which depicted the Plaintiff in the nude. She told the Plaintiff that the pictures were at the request of JEFFREY EPSTEIN, and paid the Plaintiff for posing for the photographs.
12. As a result, the Plaintiff suffered mental anguish, mental pain and suffering, psychic trauma, and a loss of the capacity for the enjoyment of life.

WHEREFORE, THE PLAINTIFF DEMANDS JUDGMENT FOR DAMAGES AGAINST [REDACTED] IN AN AMOUNT IN EXCESS OF FIFTEEN THOUSAND DOLLARS, EXCLUSIVE OF COSTS AND INTEREST AND FURTHER DEMANDS TRIAL BY JURY.

RICHARD H. WILLITS, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461

By: 
RICHARD H. WILLITS
Florida Bar No.: 139888

IN THE CIRCUIT COURT OF THE
FIFTEENTH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA.

CASE NO.: 502008CA005240XXXXMB *AF*


Plaintiff,

vs.

JEFFREY EPSTEIN, and 
Defendants.

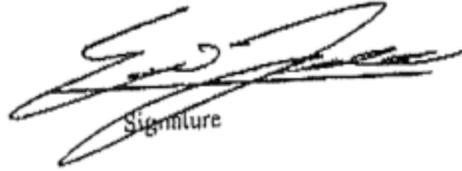
FILED
08 JUL -2 AM 2:23
SHARON R. BOCK, CLERK
PALM BEACH COUNTY, FL
CIRCUIT CIVIL 3

AFFIDAVIT OF IMPROPER SERVICE

COMES NOW ERIC LAMAZARES, who after first being duly sworn, deposes and says:

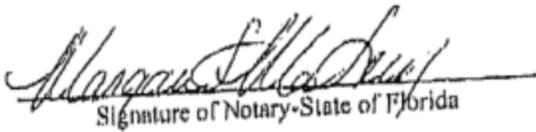
1. He is over the age of 21 and is otherwise competent to testify
2. He has personal knowledge of the facts contained herein.
3. He personally obtained service of process upon the defendant Jeffrey Epstein by posting the process on his residence.
4. Because of the type of service, the undersigned is of the opinion that it may be improper. The attorney for the plaintiff does not concede the issue, but is concerned that the defendant Jeffrey Epstein will contest the validity of that manner of service of process, and that it may be found improper.
5. The defendant Jeffrey Epstein is presently incarcerated in the Palm Beach County Stockade.
6. The attorney for the plaintiff desires personal service on Jeffrey Epstein while he is in the Palm Beach County Stockade.

FURTHER AFFIANT SAYETH NAUGHT.


Signature

STATE OF FLORIDA
COUNTY OF PALM BEACH

The foregoing instrument was acknowledged before me this 2nd day of July, 2008, by
Margaret Matney.


Signature of Notary-State of Florida

Commission Stamp:  NOTARY PUBLIC-STATE OF FLORIDA
Margaret Matney
Commission # DD369285
Expires: NOV 04, 2008
Bonded Thru Atlantic Bonding Co., Inc.

Personally Known OR Produced Identification

Type of identification produced FLDL

JS 44 (Rev. 2/08)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.) **NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.**

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| <p>I. (a) PLAINTIFFS</p> <p>(b) County of Residence of First Listed Plaintiff <u>PALM BEACH COUNTY</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number)</p> <p>RICHARD H. WILLITS, P.A. 2290 10TH AVENUE NORTH, SUITE 404 LAKE WORTH, FL 33461</p> | <p>DEFENDANTS</p> <p><u>EPSTEIN, JEFFREY</u></p> <p>County of Residence of First Listed Defendant _____ (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT LAND INVOLVED.</p> <p>Attorneys (If Known) SEE ATTACHED</p> |
|--|--|

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

| | | | | | | | | | | | | | | | | | | | | | | | | | |
|---|--|-------------------------------------|---|--------------------------|--------------------------|-----|-----|-----------------------|-------------------------------------|--------------------------|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|---|--------------------------|--------------------------|---|--------------------------|--------------------------|----------------|--------------------------|--------------------------|
| <p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input type="checkbox"/> 2 U.S. Government Defendant</p> <p><input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p> <p style="font-size: 2em; font-weight: bold; color: blue;">08CV80811 WJZ/LSS</p> | <p>III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:33%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Incorporated or Principal Place of Business in This State</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> </table> | | PTF | DEF | | PTF | DEF | Citizen of This State | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> | <input type="checkbox"/> | Citizen of Another State | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> | <input type="checkbox"/> | Citizen or Subject of a Foreign Country | <input type="checkbox"/> | <input type="checkbox"/> | Foreign Nation | <input type="checkbox"/> | <input type="checkbox"/> |
| | PTF | DEF | | PTF | DEF | | | | | | | | | | | | | | | | | | | | |
| Citizen of This State | <input checked="" type="checkbox"/> | <input type="checkbox"/> | Incorporated or Principal Place of Business in This State | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | |
| Citizen of Another State | <input type="checkbox"/> | <input checked="" type="checkbox"/> | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> | <input type="checkbox"/> | Foreign Nation | <input type="checkbox"/> | <input type="checkbox"/> | | | | | | | | | | | | | | | | | | | | |

| IV. NATURE OF SUIT (Place an "X" in One Box Only) | |
|--|---|
| <p>CONTRACT</p> <p><input type="checkbox"/> 110 Insurance</p> <p><input type="checkbox"/> 120 Marine</p> <p><input type="checkbox"/> 130 Miller Act</p> <p><input type="checkbox"/> 140 Negotiable Instrument</p> <p><input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment</p> <p><input type="checkbox"/> 151 Medicare Act</p> <p><input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans)</p> <p><input type="checkbox"/> 153 Recovery of Overpayment of Veterans' Benefits</p> <p><input type="checkbox"/> 160 Stockholders' Suits</p> <p><input type="checkbox"/> 190 Other Contract</p> <p><input type="checkbox"/> 195 Contract Product Liability</p> <p><input type="checkbox"/> 196 Franchise</p> | <p>TORTS</p> <p>PERSONAL INJURY</p> <p><input type="checkbox"/> 310 Airplane</p> <p><input type="checkbox"/> 315 Airplane Product Liability</p> <p><input type="checkbox"/> 320 Assault, Libel & Slander</p> <p><input type="checkbox"/> 330 Federal Employers' Liability</p> <p><input type="checkbox"/> 340 Marine</p> <p><input type="checkbox"/> 345 Marine Product Liability</p> <p><input type="checkbox"/> 350 Motor Vehicle</p> <p><input type="checkbox"/> 355 Motor Vehicle Product Liability</p> <p><input checked="" type="checkbox"/> 360 Other Personal Injury</p> <p>PERSONAL INJURY - Med. Malpractice</p> <p><input type="checkbox"/> 362 Personal Injury - Med. Malpractice</p> <p><input type="checkbox"/> 365 Personal Injury - Product Liability</p> <p><input type="checkbox"/> 368 Asbestos Personal Injury Product Liability</p> <p>PERSONAL PROPERTY</p> <p><input type="checkbox"/> 370 Other Fraud</p> <p><input type="checkbox"/> 371 Truth in Lending</p> <p><input type="checkbox"/> 380 Other Personal Property Damage</p> <p><input type="checkbox"/> 385 Property Damage Product Liability</p> <p>FORFEITURE/PENALTY</p> <p><input type="checkbox"/> 610 Agriculture</p> <p><input type="checkbox"/> 620 Other Food & Drug</p> <p><input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC §81</p> <p><input type="checkbox"/> 630 Liquor Laws</p> <p><input type="checkbox"/> 640 R.R. & Truck</p> <p><input type="checkbox"/> 650 Airline Regs.</p> <p><input type="checkbox"/> 660 Occupational Safety/Health</p> <p><input type="checkbox"/> 690 Other</p> <p>LABOR</p> <p><input type="checkbox"/> 710 Fair Labor Standards Act</p> <p><input type="checkbox"/> 720 Labor/Mgmt. Relations</p> <p><input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act</p> <p><input type="checkbox"/> 740 Railway Labor Act</p> <p><input type="checkbox"/> 790 Other Labor Litigation</p> <p><input type="checkbox"/> 791 Empl. Ret. Inc. Security Act</p> <p>IMMIGRATION</p> <p><input type="checkbox"/> 462 Naturalization Application</p> <p><input type="checkbox"/> 463 Habeas Corpus-Alien Detainee</p> <p><input type="checkbox"/> 465 Other Immigration Actions</p> <p>BANKRUPTCY</p> <p><input type="checkbox"/> 422 Appeal 28 USC 158</p> <p><input type="checkbox"/> 423 Withdrawal 28 USC 157</p> <p>PROPERTY RIGHTS</p> <p><input type="checkbox"/> 820 Copyrights</p> <p><input type="checkbox"/> 830 Patent</p> <p><input type="checkbox"/> 840 Trademark</p> <p>SOCIAL SECURITY</p> <p><input type="checkbox"/> 861 HIA (1395ff)</p> <p><input type="checkbox"/> 862 Black Lung (923)</p> <p><input type="checkbox"/> 863 DIWC/DIWW (405(g))</p> <p><input type="checkbox"/> 864 SSID Title XVI</p> <p><input type="checkbox"/> 865 RSI (405(g))</p> <p>FEDERAL TAX SUITS</p> <p><input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant)</p> <p><input type="checkbox"/> 871 IRS—Third Party 26 USC 7609</p> <p>OTHER STATUTES</p> <p><input type="checkbox"/> 400 State Reapportionment</p> <p><input type="checkbox"/> 410 Antitrust</p> <p><input type="checkbox"/> 430 Banks and Banking</p> <p><input type="checkbox"/> 450 Commerce</p> <p><input type="checkbox"/> 460 Deportation</p> <p><input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations</p> <p><input type="checkbox"/> 480 Consumer Credit</p> <p><input type="checkbox"/> 490 Cable/Sat TV</p> <p><input type="checkbox"/> 810 Selective Service</p> <p><input type="checkbox"/> 850 Securities/Commodities/Exchange</p> <p><input type="checkbox"/> 875 Customer Challenge 12 USC 3410</p> <p><input type="checkbox"/> 890 Other Statutory Actions</p> <p><input type="checkbox"/> 891 Agricultural Acts</p> <p><input type="checkbox"/> 892 Economic Stabilization Act</p> <p><input type="checkbox"/> 893 Environmental Matters</p> <p><input type="checkbox"/> 894 Energy Allocation Act</p> <p><input type="checkbox"/> 895 Freedom of Information Act</p> <p><input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice</p> <p><input type="checkbox"/> 950 Constitutionality of State Statutes</p> |

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding

2 Removed from State Court

3 Re-filed- (see VI below)

4 Reinstated or Reopened

5 Transferred from another district (specify)

6 Multidistrict Litigation

7 Appeal to District Judge from Magistrate Judgment

VI. RELATED/RE-FILED CASE(S). (See instructions second page):

a) Re-filed Case YES NO

b) Related Cases YES NO

JUDGE MARRA DOCKET NUMBER 08-80119, 08-80232, 08-80380, 08-80381, 08-80736

VII. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

REMOVAL FROM STATE COURT 28 USC 1332 (Diversity)

LENGTH OF TRIAL via _____ days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$ _____

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

SIGNATURE OF ATTORNEY FOR PLAINTIFF: [Signature] DATE: July 21, 2008

FOR OFFICE USE ONLY

AMOUNT 350 RECEIPT # _____ IFP _____

724505

