

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendants.

Joint Stipulation

Plaintiff, JANE DOE and Defendant, JEFFREY EPSTEIN (“Epstein”), hereby file their Joint Stipulation Regarding Certain Correspondence Obtained By Jane Doe’s attorneys during discovery, and each state:

1. In July 2010, the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos and Lehrman, PL. (the “Law Firm”), Paul G. Cassell, Esq. and Jay Howell, Esq. (“Counsel”) received through discovery certain correspondence and documents (including content thereof) between Epstein’s attorneys/agents and federal prosecutors (the “Correspondence”).

2. Counsel for Jane Doe and Counsel for Epstein disagree whether the Correspondence is confidential.

3. Without in any way altering the obligations set forth in the Addenda to Settlement Agreements entered into in the above-styled matter and in the matters of L.M. vs. Epstein, CASE NO. 502008 CA028051 XXXXMB AB and E.W. vs. Epstein, CASE NO. 502008 CA028058 XXXXMB AB, Counsel may wish to use the Correspondence in pending cases of Epstein v. Rothstein, CASE NO. 502009CA040800XXXXMB AG and In Re: Jane Does 1 and 2, CASE



NO. 08-80736-CIV-MARRA/JOHNSON. If Counsel (or Mr. Edwards as a Defendant in the Epstein v. Rothstein case) desires to file, use or disclose the Correspondence or contents thereof to anyone, Counsel agrees that prior to using any of the Correspondence in these proceedings or prior to providing or making the Correspondence available to anyone else, that they will provide seven (7) days notice to Epstein's counsel (Robert D. Critton, Jr. at rcrit@bclclaw.com and Michael J. Pike at mpike@bclclaw.com) of their intent to use or provide the Correspondence or in the alternative, file the Correspondence under seal. If Epstein chooses to serve an objection based on a claim that the Correspondence should remain confidential, his objection must be served within seven (7) days from the date of the notice. If Epstein does serve an objection, Counsel (or Mr. Edwards as a defendant) will not file (unless filed under seal) nor disclose the Correspondence to the public or third parties until the court has ruled on the objection. However, Counsel (or Mr. Edwards as a defendant) may file the Correspondence under seal or provide the Correspondence to the court for an in camera inspection if any objection is made such that the court is in a position to rule on the objection.

WHEREFORE, Plaintiff and Defendant requests that the Court enter an order on the above stipulation and grant any additional relief the Court deems just and proper.

Local Rule 7.1 Statement

Pursuant to the above rule, the undersigned counsel and Plaintiff's counsel have conferred and have agreed to same.

Respectfully submitted,

By: /s/ Robert D. Critton, Jr.
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following service list in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF on this 19th day of July, 2010:

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL



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



Paul G. Cassell, Esq.
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Co-counsel for Plaintiff

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Defendants.

Order Adopting and Entering Joint Stipulation

This matter came before the Court on Plaintiff, Jane Doe, and Defendant, Jeffrey Epstein's Joint Stipulation, and counsel being in agreement with the entry of the Stipulation, it is HEREBY ORDERED and ADJUDGED that:

1. The Joint Stipulation is hereby Adopted and Entered.
2. Without in any way altering the obligations set forth in the Addenda to Settlement Agreements entered into in the above-styled matter and in the matters of L.M. vs. Epstein, CASE NO. 502008 CA028051 XXXXMB AB and E.W. vs. Epstein, CASE NO. 502008 CA028058 XXXXMB AB, Counsel may wish to use the Correspondence in pending cases of Epstein v. Rothstein, CASE NO. 502009CA040800XXXXMB AG and In Re: Jane Does 1 and 2, CASE NO. 08-80736-CIV-MARRA/JOHNSON. If Counsel (or Mr. Edwards as a Defendant in the Epstein v. Rothstein case) desires to file, use or disclose the Correspondence or contents thereof to anyone, Counsel agrees that prior to using any of the Correspondence in these proceedings or prior to providing or making the Correspondence available to anyone else, that they will provide seven (7) days notice to

Epstein's counsel (Robert D. Critton, Jr. at rcrit@bclclaw.com and Michael J. Pike at mpike@bclclaw.com) of their intent to use or provide the Correspondence or in the alternative, file the Correspondence under seal.

3. If Epstein chooses to serve an objection based on a claim that the Correspondence should remain confidential, his objection must be served within seven (7) days from the date of the notice. If Epstein does serve an objection, Counsel (or Mr. Edwards as a defendant) will not file (unless filed under seal) nor disclose the Correspondence to the public or third parties until the court has ruled on the objection. However, Counsel (or Mr. Edwards as a defendant) may file the Correspondence under seal or provide the Correspondence to the court for an in camera inspection if any objection is made such that the court is in a position to rule on the objection.

DONE and ORDERED this _____ day of _____, 2010.

Linnea R. Johnson
United States Magistrate Judge

Courtesy Copies: Judge Kenneth Marra
Counsel of Record