

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-80736-CIV-MARRA/JOHNSON

JANE DOE #1 AND JANE DOE #2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

PROTECTIVE ORDER

Petitioners, Jane Doe #1 and Jane Doe #2 (the “victims”), by and through their undersigned attorneys, and the Respondent, United States of America, by and through its undersigned attorneys, enter into the following protective order:

1. The United States will promptly produce to counsel for the Petitioners, Jane Doe #1 and Jane Doe #2, the complete, unredacted Non-Prosecution Agreement between the United States and Jeffrey Epstein and any and all addenda, memoranda of understanding, or similar documents that bear on the enforceability and meaning of the Agreement. At a minimum, this will include any executed Agreement from September 2007 and all accompanying addenda, and addenda to the Agreement from October 2007, and a letter bearing on the interpretation of the Agreement from December 2007. No names or content shall be redacted.

2. Counsel for the victims are permitted to disclose the Non-Prosecution Agreement and related materials covered in paragraph one to any co-counsel, experts, clients or legal assistants working on the above-captioned case or any related civil case.

3. Counsel for the victims, and any persons to whom they disclose the Non-Prosecution Agreement, shall be bound by this Protective Order and shall not disclose the contents of the Agreement and any related material described in paragraph one to other persons without leave of Court. Counsel for the victims shall make their clients, and other persons to whom they disclose the provisions of the Agreement, aware of the obligation not to disclose and of the Court's ability to punish any improper disclosure of the Agreement. Nothing in this paragraph shall preclude counsel for the victims, the victims, or others who review the Agreement from disclosing information about the contents of the Agreement that they obtained in other ways. For example, counsel for the victims remain free to refer publicly to the portions of the Agreement that have been described in the Government's pleadings responding to the victims' motion alleging violations of their rights under the CVRA. As another example, the victims are free to refer to information previously provided to them by law enforcement agents regarding the Agreement.

4. This Protective Order is entered without prejudice. Nothing in this Protective Order precludes the victims from seeking modifications to it. Victims or victims' counsel are permitted to request that the Protective Order be lifted at any hearing where the counsel for Jeffrey Epstein are present to be heard on the issue of public

disclosure of the Agreement.

Dated: _____

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