

Dive

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CV-80232-MARRA-JOHNSON

JANE DOE NO. 3,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF JANE DOE 3'S ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

Plaintiff, JANE DOE 3, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Interrogatory, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

"A"

CC: JG, NE, DI

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Royal Palm Beach, FL

- 4. Have you ever been convicted of a crime, other than any juvenile adjudication, which under the law under which you were convicted was punishable by death or imprisonment in excess of 1 year, or that involved dishonesty or a false statement regardless of the punishment? If so, state as to each conviction the specific crime and the date and place of conviction.

Answer:

[REDACTED]

- 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:

Plaintiff

Other victims making similar allegations of sexual misconduct against Defendant Epstein who have brought civil claims against Epstein in Florida State and Federal courts.

Defendant

[REDACTED] Defendant's assistant

Unknown staff members of Defendant, including the chef/cook, gardener, and maid

[REDACTED]
Accompanied Plaintiff to Defendant's estate on at least one occasion

[REDACTED]
Accompanied Plaintiff to Defendant's estate on at least one occasion

[REDACTED]
Accompanied Plaintiff to Defendant's estate on at least one occasion

[REDACTED]
Accompanied Plaintiff to Defendant's estate on at least one occasion

[REDACTED]

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[REDACTED]

Plaintiff has seen Dr. [REDACTED] for therapy since Jan. 2008.

[REDACTED]

Plaintiff has seen Dr. [REDACTED] for medication management since Nov. 2007.

[REDACTED]
[REDACTED] 4

who treated Plaintiff from Aug. 2007-Dec. 2007.

Discovery is ongoing and will be supplemented in accordance with the Federal Rules of Civil Procedure.

- 6. Please state the specific nature and substance of the knowledge that you believe the person(s) identified in your response to interrogatory no. 5 may have.

Answer:

See Plaintiff's Answer to Interrogatory No. 5.

- 7. Were you suffering from physical infirmity, disability, disease, sickness, or psychiatric/psychological condition at the time of the incident(s) described in the complaint? If so, what was the nature of the infirmity, disability, or sickness?

Answer:

[REDACTED]

- 8. Did you consume any alcoholic beverages or take any drugs or medications within 12 hours before the time of each incident(s) described in the complaint? If so, state the type and amount of alcoholic beverages, drugs, or medication which were consumed, and when and where you consumed them.

Answer: