

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

C.M.A.,

Plaintiff(s),

vs.

JEFFREY EPSTEIN and SARAH
KELLEN,

Defendant(s).

PLAINTIFF'S INITIAL DISCLOSURE

COMES NOW the Plaintiff, C.M.A., by and through her undersigned attorneys, and hereby files her Initial Disclosure in compliance with the Joint Discovery Plan/Scheduling Report dated August 18, 2008, as follows:

(A) Name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claim or defenses, unless solely for impeachment, identifying the subjects of the information:

1. C.M.A.

c/o her attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300

Richard Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Tel: (561) 582-7600



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Subject matter: Plaintiff.


2. Jeffrey Epstein
c/o his attorneys:

Robert Critton, Esquire
Burman Critton Luttier & Coleman LLP
515 North Flagler Drive, Suite 400
West Palm Beach, FL 33414
Tel: (561) 842-2820

Jack A. Goldberger, Esquire
Atterbury, Goldberger & Weiss, P.A.
250 Australian Avenue South
West Palm Beach, FL 33401
Tel: (561) 863-9100

Bruce E. Reinhart, Esquire
Bruce E. Reinhart, P.A.
250 South Australian Avenue
Suite 1400
West Palm Beach, FL 33401
Tel: (561) 202-6360

Subject matter: Defendant

3. 
c/o C.M.A.'s attorneys:

Jack Scarola, Esq. and Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300

Richard Willits, Esq.
Richard H. Willits, P.A.
2290 10th Avenue North, Suite 404
Lake Worth, FL 33461
Tel: (561) 582-7600

Subject matter: C.M.A.'s involvement with Epstein.

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4. Sarah Kellen
(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.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: (561) 515-1400

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
2028 Harrison Street, Suite 202
Hollywood, FL 33020
Tel: (954) 414-8033

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

Subject matter: Victim of Epstein.

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

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

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.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

Subject matter: Victim of Epstein.

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

Theodore Leopold, Esquire
Leopold, Kuvin, P.A.
2925 P.G.A. Boulevard, Suite 200
Palm Beach Gardens, FL 33410
Tel: (561) 515-1400

Subject matter: Victim of Epstein.

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12. Jane Doe #7 (Case No.: 9:08-cv-80993-KAM)
c/o her attorney:

Jeffrey M. Herman, Esquire
Herman & Mermelstein, P.A.
18205 Biscayne Boulevard, Suite 2218
Miami, FL 33160
Tel: (305) 931-2200

Subject matter: Victim of Epstein.

13. A.C. (Case No.: 502008CA025129XXXMB AI)
c/o her attorneys:

Jack Scarola, Esquire
Jack P. Hill, Esquire
Searcy Denney Scarola Barnhart & Shipley, P.A.
2139 Palm Beach Lakes Boulevard
West Palm Beach, FL 33409
Tel: (561) 686-6300


Subject matter: Victim of Epstein.

14. Jose Alessi
(Address unknown at this time)

Subject matter: Jeffrey Epstein's Butler.

15. 


Subject matter: Investigator.

16. Lanaa Belohavek
Palm Beach County Prosecutors Office


Subject matter: Prosecutor.

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17. [Redacted]
Palm Beach Police Department

[Redacted]

Subject matter: Investigator.

18. Anthony Figueroa
[Redacted]

Subject matter: Former boyfriend of a victim of Epstein.

19. [Redacted]
[Redacted]

Subject matter: Investigator.

20. Shawn W. Haught
[Redacted]

Subject matter: Plaintiff's former boyfriend.

21. Tony Higgins, supervisor
Sanitation Bureau of the Town of Palm Beach
[Redacted]

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

22. [Redacted]
Palm Beach County Sheriff's Office
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[Redacted]

Subject matter: Investigator.

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23. [REDACTED]
(Address will be provided upon receipt)

Subject matter: Victim and friend of C.M.A.
24. Ghislane Maxwell c/o Ghislane Corp.
3580 Brillo Way
Palm Beach, FL 33480

Subject matter: Associate of Epstein.
25. Susan Pope
Parent Child Center
[REDACTED]

Subject matter: Counselor at Parent Child Center.
26. [REDACTED]
[REDACTED]

Subject matter: Investigator.
27. [REDACTED]
[REDACTED]

Subject matter: Investigator.
28. Haley Robson
(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.

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30.



Department
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Subject matter: Investigator

31.



First Assistant U.S. Attorney



Subject matter: Federal prosecutor.

32.



Investigation
, Suite 500
3401

Subject matter: Investigator.

33.

Dr. Thys
Address will be provided upon receipt
West Palm Beach

Subject matter: C.M.A.'s physician.

34.



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01

Subject matter: Federal prosecutor.

35.



Subject matter: Friend of C.M.A's mother.

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36. [REDACTED]
 (Address will be provided upon receipt)

Subject matter: Friend of C.M.A.'s mother

37. [REDACTED]
 (Address will be provided upon receipt)

Subject matter: Potential victim and friend of C.M.A.

38. Nadia Marcinkova
 (Address unknown at this time)

Subject matter: Associate of Epstein who may have been involved in encounters between Epstein and C.M.A.

(B) A copy of, or description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claim or defenses, unless solely for impeachment:

Plt. No.	Def. No.	Description of Exhibit	Counsel	Objec- tion	Marked in Evid.	Marked for Ident.
	1	Visitation Log				
	2	Any deposition in any other case involving molestation allegations against Jeffrey Epstein				
	3	U.S. Department of Justice's complete file, records and evidence				
	4	Federal Bureau of Investigation's complete file, records and evidence				
	5	Palm Beach County Sheriff's Office's complete file, records and evidence				
	6	Palm Beach County Prosecutor's complete file, records and evidence				
	7	Palm Beach Police Department's complete file, records and evidence				
	8	Palm Beach Police Department Probable Cause Affidavits				

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(C) A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered:

All damages recoverable for personal injury under Florida law including the following:

- suffered bodily injury;
- pain and suffering;
- disability;
- disfigurement;
- mental anguish;
- loss of the capacity for the enjoyment of life; and
- Medical and nursing care and treatment.

The economic damages have not yet been calculated. The noneconomic damages are for the jury's determination.

Statutory damages pursuant to 18 USCA §2255.

Punitive damages.

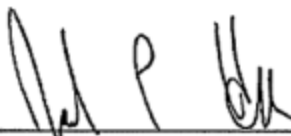
(D) for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payment made to satisfy the judgment." Fed.R.Civ.P.26(a):

Plaintiff is unaware of any applicable insurance policies. Discovery is ongoing.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by
U.S. Mail to all counsel on the attached list, this 2nd day of February, 2009.



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jsx@searcylaw.com
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