

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CASE NO. 17 Civ 616 (JGK)**

JANE DOE 43,

Plaintiff,

vs.

JEFFREY EPSTEIN, GHISLAINE  
MAXWELL, [REDACTED]

AND [REDACTED]

Defendants.

**ANSWER OF LESLEY [REDACTED]**

Defendant Lesley [REDACTED] (“[REDACTED]”), by and through her counsel, answers and responds to Plaintiff [REDACTED] [REDACTED] (“Plaintiff” or “[REDACTED]”) First Amended Complaint (the “Complaint”).

**PRELIMINARY STATEMENT<sup>1</sup>**

[REDACTED] enjoys the same protections of the self-incrimination clause of the Fifth Amendment to the United States Constitution (the “Fifth Amendment”) as do all other persons who are potentially subject to criminal prosecution in a jurisdiction in which the Fifth Amendment applies. It is [REDACTED] express intent in this Answer to claim the fullest possible protection of the United States Constitution in responding to the Complaint. [REDACTED] does not intend by any of her responses to waive such protection and requests that, in cases of any doubt or ambiguity, her response be construed as an assertion rather than a waiver of such privilege. [REDACTED] also reserves her right to amend her responses without compromising her rights under the Fifth Amendment.

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<sup>1</sup> [REDACTED] is not required to respond to the headings set forth in the Complaint since they are not factual allegations.

**RESPONSE TO SPECIFIC ALLEGATIONS**

1. [REDACTED] admits that the Plaintiff purports to bring this lawsuit pursuant to the statutes described in Paragraph 1.

2. In response to the allegations in Paragraph 2, [REDACTED] admits that the Plaintiff filed this lawsuit under a pseudonym purportedly for the reasons stated therein.

3. It appears that the allegations in Paragraph 3 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

4. It appears that the allegations in Paragraph 4 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

5. It appears that the allegations in Paragraph 5 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

6. It appears that the allegations in Paragraph 6 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

7. It appears that the allegations in Paragraph 7 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

8. [REDACTED] admits that she is a citizen of the United States. In response to the other allegations in Paragraph 8, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

9. It appears that the allegations in Paragraph 9 state conclusions of law, to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

10. It appears that the allegations in Paragraph 10 state conclusions of law, as to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

11. To the extent the allegations in Paragraph 11 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

12. It appears that the allegations in Paragraph 12 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

13. It appears that the allegations in Paragraph 13 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

14. To the extent the allegations in Paragraph 14 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

15. It appears that the allegations in Paragraph 15 are directed to individuals other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

16. It appears that the allegations in Paragraph 16 are directed to individuals other than [REDACTED] to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

17. In response to the allegations in Paragraph 17, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

18. To the extent the allegations in Paragraph 18 concern [REDACTED] [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

19. To the extent the allegations in Paragraph 19 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

20. To the extent the allegations in Paragraph 20 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

21. To the extent the allegations in Paragraph 21 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

22. To the extent the allegations in Paragraph 22 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

23. It appears that the allegations in Paragraph 23 are directed to individuals other than [REDACTED] to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

24. To the extent the allegations in Paragraph 24 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

25. To the extent the allegations in Paragraph 25 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

26. To the extent the allegations in Paragraph 26 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

27. It appears that the allegations in Paragraph 27 are directed to individuals other than [REDACTED] to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

28. To the extent the allegations in Paragraph 28 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

29. It appears that the allegations in Paragraph 29 are directed to an individual other than [REDACTED] to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

30. To the extent the allegations in Paragraph 30 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

31. To the extent the allegations in Paragraph 31 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

32. To the extent the allegations in Paragraph 32 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

33. To the extent the allegations in Paragraph 33 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

34. To the extent the allegations in Paragraph 34 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

35. It appears that the allegations in Paragraph 35 are directed to an individual other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

36. It appears that the allegations in Paragraph 36 are directed to individuals other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

37. To the extent the allegations in Paragraph 37 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

38. To the extent the allegations in Paragraph 38 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

39. It appears that the allegations in Paragraph 39 are directed to individuals other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

40. To the extent the allegations in Paragraph 40 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

41. To the extent the allegations in Paragraph 41 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

42. To the extent the allegations in Paragraph 42 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

43. To the extent the allegations in Paragraph 43 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

44. To the extent the allegations in Paragraph 44 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

45. To the extent the allegations in Paragraph 45 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

46. It appears that the allegations in Paragraph 46 are directed to individuals other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

47. It appears that the allegations in Paragraph 47 are directed to individuals other than [REDACTED], to which no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

48. To the extent the allegations in Paragraph 48 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

49. To the extent the allegations in Paragraph 49 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

50. To the extent the allegations in Paragraph 50 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

51. To the extent the allegations in Paragraph 51 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations

are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

52. To the extent the allegations in Paragraph 52 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

53. To the extent the allegations in Paragraph 53 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

54. To the extent the allegations in Paragraph 54 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

55. To the extent the allegations in Paragraph 55 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

56. To the extent the allegations in Paragraph 56 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

57. To the extent the allegations in Paragraph 57 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

58. To the extent the allegations in Paragraph 58 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

59. To the extent the allegations in Paragraph 59 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

60. To the extent the allegations in paragraph 60 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive

pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

61. To the extent the allegations in Paragraph 61 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

62. To the extent the allegations in Paragraph 62 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

63. To the extent the allegations in Paragraph 63 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

64. To the extent the allegations in Paragraph 64 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

65. To the extent the allegations in Paragraph 65 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

66. To the extent the allegations in Paragraph 66 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

67. In response to Paragraph 67, [REDACTED] repeats and incorporates her responses to Paragraphs 1 through 66 of the Complaint.

68. To the extent the allegations in Paragraph 68 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

69. To the extent the allegations in Paragraph 69 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

70. To the extent the allegations in Paragraph 70 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

71. To the extent the allegations in Paragraph 71 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

72. To the extent the allegations in Paragraph 72 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

73. To the extent the allegations in Paragraph 73 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

74. It appears the allegations in Paragraph 74 state conclusion of law, as to which no response is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

75. To the extent the allegations in Paragraph 75 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

76. To the extent the allegations in Paragraph 76 concern [REDACTED] conduct, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer. In so far as the allegations are directed to individuals other than [REDACTED] and/or state conclusions of law, no responsive pleading is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

77. It appears the allegations in Paragraph 77 state conclusion of law, as to which no response is required. To the extent a response is required, [REDACTED] asserts her rights under the Fifth Amendment and declines to answer.

### **DEFENSES**

By alleging the following defenses, [REDACTED] does not assume any burden of proof, persuasion, or production not otherwise legally assigned to him. [REDACTED] reserves all rights to assert other defenses as appropriate.

#### **First Defense**

The Complaint fails to state a claim upon which relief can be granted against [REDACTED].

#### **Second Defense**

Plaintiff's claim is barred, in whole or in part, by the applicable statute of limitations and/or laches.

#### **Third Defense**

Plaintiff failed to mitigate damages in whole or in part.

**Fourth Defense**

Plaintiff's claim is barred, in whole or in part, by the doctrines of assumption of risk, estoppel, unclean hands, waiver, consent and/or ratification.

**Fifth Defense**

Plaintiff's damages, if any, resulted from the acts or omissions of Plaintiff or third parties other than [REDACTED].

**Sixth Defense**

The damages, if any, alleged in the Complaint were directly and proximately caused, in whole or in part, by superseding or intervening conduct for which [REDACTED] cannot be held liable.

**Seventh Defense**

The conduct alleged does not constitute a violation, and is beyond the scope, of the federal criminal anti-sex trafficking statutes upon which this suit is based, none of which are meant to regulate voluntary private relationships.

**Eighth Defense**

Plaintiff's claim is barred because Plaintiff was an educated, experienced and sophisticated individual who was free to associate and form relationships with anyone and free to terminate her association and relationships with anyone.

**Ninth Defense**

Plaintiff's claim is barred because Plaintiff did not actually rely and did not detrimentally and/or reasonably rely upon any misrepresentations or omissions alleged in the Complaint.

**Tenth Defense**

This Court lacks personal jurisdiction over [REDACTED].

