

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

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

<p>[REDACTED]</p> <p>Plaintiff,</p> <p>vs.</p> <p>JEFFREY EPSTEIN, GHISLAINE MAXWELL, [REDACTED]</p> <p>Defendants.</p>
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**DEFENDANT I [REDACTED]  
INITIAL RULE 26(a)(1)(A) DISCLOSURE STATEMENT**

Defendant [REDACTED], by and through her attorneys, Steptoe & Johnson LLP, hereby submits her Initial Disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure based upon information currently known or available.

**PRELIMINARY STATEMENT**

[REDACTED] enjoys the protections of the self-incrimination clause of the Fifth Amendment to the United States Constitution (the "Fifth Amendment"). It is [REDACTED] express intent in this Disclosure Statement to claim the fullest possible protection of the United States Constitution.

[REDACTED] does not intend by any of her disclosures to waive such protection and requests that, in cases of any doubt or ambiguity, her disclosures be construed as an assertion rather than a waiver of such privilege. [REDACTED] also reserves her right to amend her disclosures without compromising her rights under the Fifth Amendment.

In addition, the production of any documents referred to in this Disclosure Statement shall not be construed to waive: (i) the attorney-client privilege and/or the work-product doctrine, either generally or as they may attach to particular documents; or (ii) the admissibility of the

documents in this case. This Disclosure Statement shall not in any way constitute a waiver of [REDACTED] defenses. [REDACTED] reserves her right to supplement and amend these Initial Disclosures as discovery proceeds and additional information becomes known or discoverable without compromising any of the aforementioned rights, privileges, protections, or the admissibility of any documents.

### Disclosures

**I. Rule 26(a)(1)(A)(i) Disclosures**

[REDACTED] asserts her right under the Fifth Amendment to decline to make this disclosure.

**II. Rule 26(a)(1)(A)(ii) Disclosures**

[REDACTED] asserts her right under the Fifth Amendment to decline to make this disclosure.

**III. Rule 26(a)(1)(A)(iii) Disclosures**

[REDACTED] does not currently claim any damages in connection with this action.

**IV. Rule 26(a)(1)(A)(iv) Disclosures**

Subject to and without compromising any of the above-referenced rights, privileges, protections, and/or the admissibility of any documents, [REDACTED] has no insurance agreements under which an insurance business may be liable to satisfy all or part of a possible judgment or to indemnify or to reimburse for payments made to satisfy the judgment.

Dated: August \_\_, 2018  
New York, New York

STEPTOE & JOHNSON LLP

By: /s/ Michael C. Miller  
Michael C. Miller  
Justin Y.K. Chu



*Attorneys for Defendants Jeffrey Epstein,* 



**CERTIFICATE OF SERVICE**

I hereby certify that, on \_\_\_\_\_, 2018, I served the foregoing document via e-mail on the counsel of record for all parties appearing in this matter.

/s/ Justin Y.K. Chu