

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT IN AND
FOR PALM BEACH COUNTY,
FLORIDA

CASE NO:
502008CA037319XXXXMB AB

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Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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**MOTION TO COMPEL PROPER RESPONSES TO PLAINTIFF'S SUPPLEMENTAL
REQUESTS FOR ADMISSION DATED FEBRUARY 4, 2010**

Plaintiff, █, by and through undersigned counsel, hereby files this Motion to Compel Defendant, JEFFREY EPSTEIN, to properly respond to Plaintiff's Requests for Admission Dated February 4, 2010, and as grounds therefore states as follows:

1. On February 4, 2010, Plaintiff served Defendant with twelve Requests for Admissions. (Exhibit "A").
2. On March 17, 2010, Defendant responded to each Request identically (Exhibit "A") – in essence acknowledging that Defendant intends to respond to all relevant discovery but at the moment is asserting his U.S. Constitutional privileges.
3. Florida Statute § 775.15 prescribes the statute of limitations for the criminal acts Defendant committed upon Plaintiff. Statute attached hereto as Exhibit "B."
4. Plaintiff is a victim of the second degree felonies prescribed under Florida Statutes §§ 800.04 ("Lewd or lascivious offenses committed upon or in the presence of persons