

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 08-80736-CIV-MARRA/JOHNSON

JANE DOE 1 and JANE DOE 2,

Plaintiffs

v.

UNITED STATES OF AMERICA,

Defendant

_____ /

**INTERVENOR EPSTEIN'S UNOPPOSED MOTION FOR A SUPPLEMENTAL
PROTECTIVE ORDER**

Now comes Intervenor, Jeffrey Epstein, who moves that this Honorable Court issue a supplemental Protective Order that would expand the limited Protective Order allowed in its decision Granting in Part and Denying in Part the Intervenors' Motion for a Protective Confidentiality Order. [D.E. 255 at 4]. The purpose of the proposed supplement to the previously ordered Protective Order is to require that any party would be required to file under seal any portion of the plea negotiation correspondence between the Government and Epstein's counsel, whether offered as an exhibit or quoted from in the content of a pleading or motion. Such a redacted filing would in all other respects be filed as a public filing unless subject to other orders of the Court, and each party would reserve the right to move to unseal any redacted pleading or sealed exhibit. After consultation with their counsel, both the Plaintiffs and the Government do not oppose the allowing of this Motion.

Respectfully submitted,

JEFFREY EPSTEIN
By His Attorneys,

/s/Roy Black

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CERTIFICATE OF SERVICE

I HERE CERTIFY that a true copy of the foregoing was filed via CM/ECF, this
8th day of October, 2014.

/s/Roy Black
Roy Black

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**PROPOSED
ORDER OF CONFIDENTIALITY (“PROTECTIVE ORDER”)**

THIS CAUSE came before the Court upon the Intervenor’s Unopposed Motion for a Supplemental Protective Order. The Motion is hereby GRANTED, and it is ORDERED that:

1. The Supplemental Protective Order applies to all correspondence between the United States Attorney’s Office and the Intervenor and his counsel, including any attachments thereto, that was the subject of the Court’s Order of June 18, 2013 [D.E. 188], hereinafter referred to as the “Confidential Discovery Material.”
2. The Supplemental Protective Order incorporates the limited Protective Order of the Court’s September 22, 2014 Order. [D.E. 255 at 4–5].
3. The Parties and Intervenor are further ordered that the filing of any “Confidential Discovery Material” as defined in paragraph one of this Order

shall be under seal, and further that any quotations from the “Confidential Discovery Material” in any pleading or motion shall be redacted from any public filing, with each party and the intervenor reserving the right to seek a further order unsealing the exhibit or the redacted portion of any filing. The Court also reserves the right to unseal any sealed exhibit or redacted portion of any filing with notice to the parties and intervenor.

DONE and ORDERED in chambers in West Palm Beach Florida this 8th day of October, 2014.

Kenneth Marra
United States District Judge

cc: All Counsel