

Mermelstein & Horowitz PA
attorneys at law

Jessica D. Arbour

www.sexabuseattorney.com

April 13, 2010

Via Facsimile and US Mail

Robert D. Critton, Jr.
Burman, Critton, Luttier & Coleman

Re: *Jane Doe 8 v. Jeffrey Epstein*

Dear Mr. Critton:

In response to your letter of March 8, 2010, regarding [REDACTED]'s discovery responses, our client can provide the following information:

1. Yes. In addition, she has done some odd jobs for [REDACTED] between 1999 and the present, and has been paid in cash.
2. She is unable to remember most of her supervisors on her jobs. She recalls that her supervisor at [REDACTED] was a male, but she has no further information about him.
3. [REDACTED]
4. [REDACTED]
5. At this point, the Plaintiff does not have a full understanding of the total extent of her damages, and it will, of course, be subject to expert opinions. To date, the Plaintiff has suffered, and may continue to suffer, anger issues, trust issues (especially with men), chemical dependency that has required multiple attempts at treatment, diminished sense of sexual boundaries, promiscuity, low self-esteem, fear, pessimism about her future, and unhealthy romantic relationships.
6. Contrary to your letter, Interrogatory No. 25 was answered in full:

Yes.

c/o Spencer Kuvin, Esq.

Plaintiff has known [REDACTED] since approximately [REDACTED]. Plaintiff Jane Doe No. 8 disclosed to [REDACTED] that she had hired an attorney to represent her in a potential claim against Epstein and [REDACTED] told Jane Doe No. 8 that she had a claim against Epstein as well.

7. [REDACTED]'s tax release authorization is attached.
8. At this point, the full extent of [REDACTED]'s economic damages, if any, have not been determined and will, of course, be subject to expert opinion. [REDACTED] believes she has not paid any out-of-pocket expenses for [REDACTED]. However, an expert may opine that her lack of education and lack of steady employment relates to her sexual assault by Jeffrey Epstein. That is why the Plaintiff reserved the right to amend or supplement her Answers to Interrogatories as discovery proceeds. Contrary to your letter [REDACTED] did not attach any records to her Answers to Interrogatory Nos. 2 & 3.
9. The Rules of Civil Procedure require a plaintiff to produce materials which are in the care, custody, or control of a party. No further explanation is required.

If you would like the Plaintiff to formally amend her discovery responses with this information, please advise.

Very truly yours,

[REDACTED]
Jessica D. Arbour

JDA/
Enclosure

Request for Copy of Tax Return

(Rev. January 2010)

Department of the Treasury
Internal Revenue Service

▶ Request may be rejected if the form is incomplete or illegible.

Tip. You may be able to get your tax return or return information from other sources. If you had your tax return completed by a paid preparer, they should be able to provide you a copy of the return. The IRS can provide a **Tax Return Transcript** for many returns free of charge. The transcript provides most of the line entries from the original tax return and usually contains the information that a third party (such as a mortgage company) requires. See **Form 4506-T, Request for Transcript of Tax Return**, or you can call 1-800-829-1040 to order a transcript.

4a. Name shown on tax return. If a joint return, enter the name shown first.

4b. First and last name of preparer (see instructions)

4c. Joint tax return



5 If the tax return is to be mailed to a third party (such as a mortgage company), enter the third party's name, address, and telephone number. The IRS has no control over what the third party does with the tax return.

Caution. If the tax return is being mailed to a third party, ensure that you have filled in line 6 and line 7 before signing. Sign and date the form once you have filled in these lines. Completing these steps helps to protect your privacy.

6 **Tax return requested.** Form 1040, 1120, 941, etc. and all attachments as originally submitted to the IRS, including Form(s) W-2, schedules, or amended returns. Copies of Forms 1040, 1040A, and 1040EZ are generally available for 7 years from filing before they are destroyed by law. Other returns may be available for a longer period of time. Enter only one return number. If you need more than one type of return, you must complete another Form 4506. ▶

Note. If the copies must be certified for court or administrative proceedings, check here

7 **Year or period requested.** Enter the ending date of the year or period, using the mm/dd/yyyy format. If you are requesting more than eight years or periods, you must attach another Form 4506.

8 **Fee.** There is a \$57 fee for each return requested. Full payment must be included with your request or it will be rejected. Make your check or money order payable to "United States Treasury." Enter your SSN or EIN and "Form 4506 request" on your check or money order.

a	Cost for each return	\$	57.00
b	Number of returns requested on line 7		
c	Total cost. Multiply line 8a by line 8b	\$	

9 If we cannot find the tax return, we will refund the fee. If the refund should go to the third party listed on line 5, check here

Signature of taxpayer(s). I declare that I am either the taxpayer whose name is shown on line 1a or 2a, or a person authorized to obtain the tax return requested. If the request applies to a joint return, either husband or wife must sign. If signed by a corporate officer, partner, guardian, tax matters partner, executor, receiver, administrator, trustee, or party other than the taxpayer, I certify that I have the authority to execute Form 4506. If the request is made by a third party, this form must be received within 120 days of signature date.

Signature of taxpayer(s): _____

Date: 3/24/2010

Telephone number of taxpayer on: _____

Spouse's signature: _____

Date: _____