

**BC  
LC** | **BURMAN, CRITTON  
LUTTIER & COLEMAN, LLP**  
YOUR TRUSTED ADVOCATES  
A LIMITED LIABILITY PARTNERSHIP

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April 26, 2010

**Sent via U.S. Mail**

Jack A. Goldberger, Esq.  
Atterbury Goldberger & Weiss, P.A.  
1000 ... Suite 1400



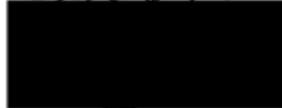
Re: **Jane Doe v. Epstein**, Case No. 08-CV-80893 – Motion for Protective  
Order re: Deposition of Story Cowles

Dear Jack:

Enclosed are the original executed affidavits of Bob Critton and Mike Pike in support of the Motion for Protective Order Regarding the Deposition of Story Cowles, which are exhibits to the motion.

Do not hesitate to contact me if you have any questions.

Best Regards,



David A. Yarema

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

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Related cases:

08-80232, 08-08380, 08-80381, 08-80994,  
08-80993, 08-80811, 08-80893, 09-80469,  
09-80591, 09-80656, 09-80802, 09-81092

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**AFFIDAVIT OF MICHAEL J. PIKE, ESQ.**

STATE OF FLORIDA                    ) SS  
COUNTY OF PALM BEACH         )

BEFORE ME, the undersigned authority, personally appeared Michael Pike, Esq., having personal knowledge and being duly sworn, deposes and says:

1. I, Michael Pike, am an attorney at the law firm of Burman, Critton, Luttier & Coleman, LLP and represent Mr. Epstein in the civil cases and claims asserted against him in this and related actions.

2. In or around October, 2009, I had telephone conferences with Spencer Kuvin, Esq. (counsel for Plaintiff, ██████ in a companion state court case) and Bradley Edwards, Esq. (counsel for Jane Doe and ██████ and ██████, Plaintiffs in companion state court cases), who were seeking to depose Story Cowles.

3. Mr. Kuvin and Mr. Edwards agreed that [REDACTED] was produced for deposition, they would not depose Mr. Cowles. Each was attempting to effectuate service of process on [REDACTED] and also knew that Mr. Cowles is an employee of Jack Goldberger, Esq.

4. [REDACTED] was produced for deposition and now Mr. Edwards is renegeing on his end of the bargain.

FURTHER THE AFFIANT SAYETH NAUGHT

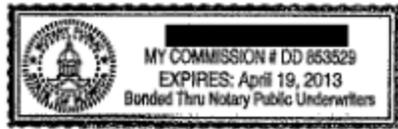
[REDACTED]  
Michael J. Pike, Esq.

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Michael J. Pike known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: \_\_\_\_\_, and that an oath was/was not taken.

26<sup>th</sup> day of April, 2010. WITNESS my hand and official seal in the County and State last aforesaid this

[REDACTED]



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV-80119-MARRA/JOHNSON

JANE DOE NO. 2,

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AFFIDAVIT OF ROBERT D. CRITTON, JR., ESQ.

STATE OF FLORIDA ) SS  
COUNTY OF PALM BEACH )

BEFORE ME, the undersigned authority, personally appeared Robert D. Critton, Jr., Esq., having personal knowledge and being duly sworn, deposes and says:

1. I, Robert Critton, and the law firm of Burman, Critton, Luttier & Coleman, LLP represent Mr. Epstein's in the civil cases and claims asserted against him in this and related actions.
2. It was and is my understanding that Story Cowles has been employed as a legal assistant for Jack Goldberger, Esq. since July 2008.
3. I have used Mr. Cowles to transmit attorney-client and work product information and documents to Mr. Epstein and other attorneys representing Mr. Epstein with the clear

understating and belief that the communications among Mr. Epstein, his attorneys and staff would be protected by the attorney-client and work product privileges.

FURTHER THE AFFIANT SAYETH N

  
Robert D. Critton, Jr., Esq.

STATE OF FLORIDA  
COUNTY OF PALM BEACH

I hereby Certify that on this day, before me, an officer duly authorized to administer oaths and take acknowledgments, personally appeared Robert Critton known to me to be the person described in and who executed the foregoing Affidavit, who acknowledged before me that he/she executed the same, that I relied upon the following form of identification of the above named person: \_\_\_\_\_, and that an oath was/was not taken.

26<sup>th</sup> day of April, 2010. WITNESS my hand and official seal in the County and State last aforesaid this

