



LEOPOLD-KUVIN^{PA}
CONSUMER JUSTICE ATTORNEYS

May 6, 2010

CERTIFIED MAIL RETURN
RECEIPT REQUESTED



Re: Jeffrey Epstein

Dear Ms. 

Enclosed please find a copy of Re-notice of Taking your Deposition which is now scheduled for Tuesday, June 15, 2010 beginning at 10:00 a.m.

Please be advised that you are still under subpoena and your appearance at this deposition is mandatory.

Should you have any questions, please don't hesitate to contact me at your convenience.

Sincerely, 


SPENCER T. KUVIN
STK/mlb
Enc.

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No: 10-80447-cv-Marra/Johnson

[REDACTED]
Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

PLAINTIFF'S RE-NOTICE OF TAKING VIDEO DEPOSITION

PLEASE TAKE NOTICE THAT THE UNDERSIGNED ATTORNEY WILL TAKE THE DEPOSITION OF:

NAME:

DATE AND TIME:

LOCATION:

[REDACTED]
June 15, 2010
10:00 AM

Intelligent Office, [REDACTED]
[REDACTED]

upon an oral examination before **Videographer and a Notary Public** or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. The depositions are being taken for purposes of discovery, for use at trial or are being taken for such other purposes as are permitted under the Rules of the Court.

WE HEREBY CERTIFY that a true and correct copy of this Notice was mailed this 7
day of MAY 2010 to Jack A. Goldberger, Esq., [REDACTED]

[REDACTED]
Robert D. Critton, Jr., Michael J. Pike,
[REDACTED]

LEOPOLD-KUVIN, P.A.
[REDACTED]

Spencer T. Kuvin, Esq.
Florida Bar No: 089737

Cc: Prose Court Reporting
Visual Evidence



WWW.PATHTOJUSTICE.COM

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

May 7, 2010

Honorable Donald W. Hafele
Main Judicial Complex
Palm Beach County Courthouse

Re: [REDACTED] v. Jeffrey Epstein / Case No. 502008CA028051XXXXMB AB -and-
[REDACTED] v. Jeffrey Epstein / Case No. 502008CP003626XXXXMB

Dear Judge Hafele:

Enclosed please find copies of Plaintiffs' proposed Agreed Orders concerning the hearing on Defendant, Jeffrey Epstein's Motion for Partial Summary Judgment on Count I of Plaintiff's Second Amended Complaint that took place on April 9, 2010, in the above-captioned matters.

Should both of these Agreed Orders meet with Your Honor's approval, please execute same in both matters and provide conformed copies to all counsel in the enclosed prepaid self-addressed envelopes provided.

If you have any questions, please feel free to call.

Thank you for your time and attention to this matter.

Respectfully Submitted,
[REDACTED]

Gary M. Farmer, Jr.

Enclosures as stated
GMF/nas

cc: Robert D. Critton, Esq. ✓
Jay Howell, Esq.
Jack Goldberger, Esq.

EFTA00612079

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

CASE NO: 502008CA028051XXXXMB AB


Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**AGREED ORDER ON DEFENDANT, JEFFREY EPSTEIN'S MOTION FOR PARTIAL
SUMMARY JUDGMENT ON COUNT I OF PLAINTIFF'S SECOND AMENDED COMPLAINT**

THIS CAUSE came on to be heard on April 9, 2010 upon Defendant, Jeffrey Epstein's Motion for Partial Summary Judgment on Count I of Plaintiff's Second Amended Complaint; the Court having reviewed and considered the motion and the record and otherwise being fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that:

During the hearing, Plaintiff's counsel indicated a desire to amend the Complaint. As such, the Court will deny as moot Defendant, Jeffrey Epstein's Motion for Partial Summary Judgment on Count I of Plaintiff's Second Amended Complaint at this time so as to allow the Plaintiff,  to file an Amended Complaint within twenty (20) days of the date of this Order. Thereafter, Defendant, Jeffrey Epstein shall have twenty (20) days to file a responsive pleading.

DONE AND ORDERED at Palm Beach County Courthouse, Palm Beach County, Florida,
this ____ day of _____, 2010.

HONORABLE DONALD W. HAFELE
Circuit Court Judge

Copies furnished to:
Gary M. Farmer, Jr., Esq.
Bradley J. Edwards, Esq.
Robert D. Critton, Jr., Esq.
Jay Howell, Esq.
Jack Alan Goldberger, Esq.

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

CASE NO. 502008CP003626XXXXMB


Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.
_____ /

**AGREED ORDER ON DEFENDANT, JEFFREY EPSTEIN'S MOTION FOR PARTIAL
SUMMARY JUDGMENT ON COUNT I OF PLAINTIFF'S SECOND AMENDED COMPLAINT**

THIS CAUSE came on to be heard on April 9, 2010 upon Defendant, Jeffrey Epstein's Motion for Partial Summary Judgment on Count I of Plaintiff's Second Amended Complaint; the Court having reviewed and considered the motion and the record and otherwise being fully advised in the premises, it is hereby

ORDERED AND ADJUDGED that:

During the hearing, Plaintiff's counsel indicated a desire to amend the Complaint. As such, the Court will deny as moot Defendant, Jeffrey Epstein's Motion for Partial Summary Judgment on Count I of Plaintiff's Second Amended Complaint at this time so as to allow the Plaintiff,  to file an Amended Complaint within twenty (20) days of the date of this Order. Thereafter, Defendant, Jeffrey Epstein shall have twenty (20) days to file a responsive pleading.

DONE AND ORDERED at Palm Beach County Courthouse, Palm Beach County, Florida,
this ____ day of _____, 2010.

Copies furnished to:

Gary M. Farmer, Jr., Esq.
Bradley J. Edwards, Esq.
Robert D. Critton, Jr., Esq.
Jay Howell, Esq.
Jack Alan Goldberger, Esq.

HONORABLE DONALD W. HAFELE
Circuit Court Judge