

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

PLAINTIFF'S PRETRIAL REQUEST FOR PRODUCTION TO DEFENDANT

Plaintiff, Jane Doe, hereby requests that Defendant, Jeffrey Epstein, produce the items set forth below within thirty (30) days of service hereof, pursuant to Fed. R. Civ. P. 34:

1. All statements of the Plaintiff pertaining to any of the issues in this lawsuit.
2. All statements of any witness you intend to use at trial for impeachment.
3. All photographs which you intend to use at trial.
4. All reports prepared by experts for the Defendants pertaining to the incident which is the subject of this lawsuit.
5. All records, including medical, which you contend show that the Plaintiff suffered from pre-existing physical or emotional problems before the incident which is the subject of this lawsuit.
6. All surveillance films, videotapes or photographs taken of the Plaintiff.
7. A complete copy of the "index" check pertaining to the Plaintiff.

8. A complete copy of all criminal records, if any, of the Plaintiff which you intend to use at trial.

9. A complete copy of each and every exhibit which you intend to introduce into evidence at trial.

10. A complete copy of the itemized bill rendered to date by each and every expert witness you intend to call at trial.

11. Complete copies of each and every illustration or drawing which you intend to use at the trial of this lawsuit.

12. A complete copy of each and every authoritative treatise or other publication which you intend to use at trial.

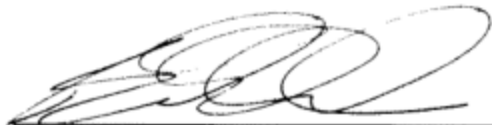
13. A complete copy of each and every IME report prepared in this matter.

14. All police reports, incident reports, or any other complaint or report in your possession that in any way relates to Plaintiff Jane Doe.

15. All statements of Jane Doe, including, but not limited to, any given to FBI, US Attorney's Office, Palm Beach Police, State Attorneys' Office or any private investigator.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the above and a copy of the foregoing has been provided this 13th day of May 2010 via U.S. Mail and email transmittal to all those on the attached service list.



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