

**IN THE ELEVENTH JUDICIAL CIRCUIT OF FLORIDA  
IN AND FOR DADE COUNTY, FLORIDA  
CIVIL DIVISION**

JEAN-LUC BRUNEL

Civil Action No.: 14-21348 CA 01  
Section 34

Plaintiff,

vs.

JEFFREY EPSTEIN,  
TYLER MCDONALD, TYLER  
MCDONALD D/B/A/ YI.ORG

Defendants.

**PLAINTIFF'S RESPONSE TO DEFENDANT JEFFREY EPSTEIN'S MOTION TO  
QUASH ATTEMPTED SERVICE**

COMES NOW, the Plaintiff JEAN-LUC BRUNEL, by and through undersigned counsel, and files this, his Response to Defendant Jeffrey Epstein's Motion to Quash Attempted Service, and states as follows:

1. On March 10, 2015, Plaintiff's process server arrived at Jeffrey Epstein's private residence in New York City, at 9 East 71<sup>st</sup> Street.
2. The process server rang the front doorbell and handed Plaintiff's Complaint to the housekeeper on duty at that time.
3. Florida Statute 48.031(1)(a) requires that service of process be directed to a "his or her usual place of abode...". The process server in the instant case did just that (Exhibit A).
4. Alternatively, if this Court finds that service of process was insufficient in the instant case, Plaintiff respectfully requests that service be effectuated through Defendant's Florida counsel, Jack Goldberger, or that Defendant be granted another 120 days in which to properly effectuate service.

WHEREFORE, Plaintiff requests that Defendant's Motion to Quash Attempted Service be denied; or that service be effectuated through Defendant's Florida counsel, Jack Goldberger; or that Defendant be granted another 120 days in which to properly effectuate service.

/s/ Joe Titone

Joe Titone  
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**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that a copy of the foregoing was served upon all counsel of record by operation of the Florida E-Filing Portal on this 10 day of April 2016.

# EXHIBIT A

[Richard Johnson - \[REDACTED\]](#)  
[epsteins-east-side-mansion-houses-russian-playmates/](#)

## Jeffrey Epstein's East Side mansion houses Russian playmates

By [Richard Johnson](#)

March 8, 2016 | 9:21am

### [Modal Trigger](#)

Jeffrey Epstein Photo: Gregory P. Mango

[Jeffrey Epstein](#) is not letting his conviction for soliciting prostitution from a teenager interfere with his lifestyle.

But instead of having his assistants troll local high schools, the billionaire money manager — and registered sex offender — is importing his playmates from Russia, my source says.

A recent visitor tells me Epstein has a house full of young beauties at his East 71st Street mansion. “Half of them are from the former Soviet Union and the other half are a mix of Americans and Europeans,” said my source.

Although all the women appeared to be at least 17, the age of consent in New York state, they were all several decades younger than 63-year-old Epstein, the visitor said.

Epstein apparently has contacts in Moscow who provide matchmaking services for both his “orgy island” in the Caribbean (which he jokingly dubbed Little St. Jeff’s) and his Manhattan townhouse.

“When the Russian girls arrive in the city, they already have Jeffrey’s phone number,” said my source.

One procurer, Peter Listerman, claims in TV interviews that he introduced many oligarchs and A-listers to Russian models, and says: “[REDACTED] not a pimp, just [a] matchmaker.”

Listerman, or a dead ringer in an Astrakhan fur hat, was photographed entering Epstein's mansion in January.

Epstein had no comment.