

IN THE FOURTH DISTRICT COURT OF APPEAL
FOR THE STATE OF FLORIDA

JEFFREY EPSTEIN,

Petitioner,

vs.

STATE OF FLORIDA,

Respondent.

CASE NO: 4D09-2554

L.T. No. 20098CF009381A (Palm
Beach)

RESPONDENT B.B.'S MOTION TO SUPPLEMENT THE RECORD

Respondent B.B. moves to supplement the record before the Court on
Petitioner Jeffrey Epstein's petition for writ of certiorari and states as follows:

1. Petitioner Epstein filed an emergency petition for writ of certiorari requesting that this Court quash the order of Fifteenth Judicial Circuit Judge Jeffrey Colbath unsealing a nonprosecution agreement between Petitioner Epstein and the United States Attorney's Office.
2. One of Petitioner Epstein's arguments for quashing the lower court order is that Respondent B.B. is able to obtain the sealed nonprosecution agreement from the United States Attorney's Office pursuant to the terms of a federal order issued by Judge Marra of the Southern District of Florida:

As Mr. Epstein's counsel stated at the June 25, 2009 hearing in front of Judge Colbath, B.B., as an alleged victim, is entitled to production of the document subject to the conditions in Judge Marra's orders (A-18:41).

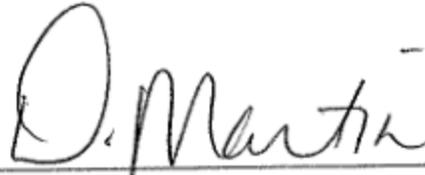
Reply Brief, p. 21, ¶ 3.

3. Respondent B.B., in fact, is not able to obtain the nonprosecution agreement from the United States Attorney's Office. Late yesterday afternoon, counsel for B.B. received the attached letter from the United States Attorney advising that he cannot disclose the nonprosecution agreement to B.B. because she was not identified by the USAO as one of Epstein's victims.
4. Although this letter was not before the trial court prior to the issuance of the order unsealing the agreement, it directly bears on the proceedings before this Court. It should also be noted that Petitioner Epstein submitted a supplemental appendix with his reply brief that includes documents created after the order under review here and were not, therefore, considered by Judge Colbath when unsealing the nonprosecution agreement.
5. The undersigned counsel for Respondent B.B. has conferred with Jane Kreuzler-Walsh, counsel for Petitioner Epstein, regarding this motion to supplement. Ms. Walsh advised that she is on vacation and would refer the matter to trial counsel. Undersigned counsel has not yet heard from trial counsel regarding Petitioner Epstein's position on this motion to supplement. As briefing in this case has been completed and the Court might rule at any time, Respondent B.B. is filing this motion without knowledge of whether opposing counsel opposes the relief requested. Respondent will file an

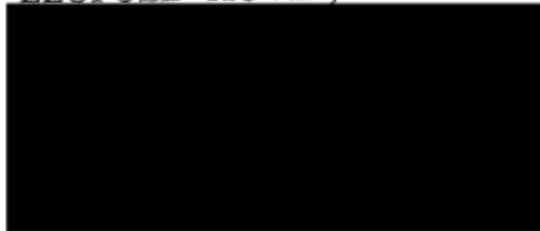
amended motion upon opposing counsel advising of the Petitioner's position on this motion.

WHEREFORE, Respondent B.B. respectfully requests the Court supplement the record before the Court on Petitioner Epstein's petition for writ of certiorari with the attached letter to Respondent B.B. from the United States Attorney's Office.

Dated: August 5, 2009

By: 

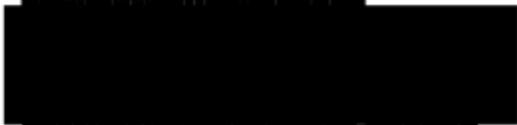
Diana L. Martin
Florida Bar No. 624489
LEOPOLD-KUVIN, P.A.



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via U.S. Mail on August 5, 2009, on the following:

Jack A. Goldberger, Esq.
Attorney For: Jeffrey Epstein



Phone:

Fax:

Jane Kreuzler-Walsh, Esq.
Barbara J. Compiani, Esq.
Attorneys For: Jeffrey Epstein
Kreuzler-Walsh, Compiani & Vargas,
P.A.



Phone:

Robert D. Critton, Jr., Michael J. Pike
Attorney For: Jeffrey Epstein



Phone:

Fax:

Jeffrey H. Sloman, Esq.
U.S. Attorney's Office-Southern District



Judith Stevenson Arco, Esq.
State Attorney's Office-West Palm
Beach



William Berger, Esq.
Attorney For: E.W.
Rothstein Rosenfeldt Adler



Deanna K. Shullman
Attorney For: Palm Beach Post



Diana L. Martin
Florida Bar No. 624489



U.S. Department of Justice

United States Attorney
Southern District of Florida

[REDACTED]
Facsimile: [REDACTED]

August 4, 2009

VIA ELECTRONIC MAIL

Spencer T. Kuvin, Esq.
Leonold-Kuvin, P.A.

[REDACTED]

Re: Jeffrey Epstein/B.B. – Requested Disclosure of Non-Prosecution Agreement

Dear Mr. Kuvin:

Thank you for your letter regarding the disclosure of the Non-Prosecution Agreement signed by Jeffrey Epstein. I understand that you are asking for a copy of that Agreement in connection with your representation of “B.B.” As you are aware, the Agreement contains a confidentiality provision. Based upon a lawsuit filed by some of Mr. Epstein’s victims, U.S. District Judge Kenneth Marra has issued a Protective Order requiring the U.S. Attorney’s Office to provide copies of the Agreement to certain individuals under certain circumstances. The Order states:

If any individuals who have been identified by the USAO [U.S. Attorney’s Office] as victims of Epstein and/or any attorney(s) for those individuals request the opportunity to review the Agreement, then the USAO shall produce the Agreement to those individuals, so long as those individuals also agree that they shall not disclose the Agreement or its terms to any third party absent further court order, following notice to and an opportunity for Epstein’s counsel to be heard . . .

(Court File No. 08-CV-80737-MARRA, DE 26, ¶ (e).)

The language “individuals who have been identified by the USAO as victims of Epstein” refers to a specific list of individuals who were the subject of the federal investigation. A list of those individuals was provided to Mr. Epstein’s attorney. Your client, B.B., was not identified during that investigation, and, therefore was not on the list. By stating this I am not, in any way, denigrating any harm that your client may have suffered. I am simply stating that, given time and resource limitations that we faced during the investigation, B.B. was not a person who was positively identified, such that she would have been the subject of charges within a

SPENCER T. KUVIN, ESQ.
AUGUST 4, 2009
PAGE 2

possible federal indictment.

For this reason, your client is not covered by the Court's Protective Order and the Agreement's confidentiality provision remains intact. If you are unable to get a copy of the Agreement via the civil discovery process in the lawsuit that you have filed against Mr. Epstein, please ask his counsel if they will consent to my production of the Agreement to you and I will send a copy to you.

Sincerely,

Jeffrey H. Sloman
Acting United States Attorney

By: *s/A. Marie Villafaña*
A. Marie Villafaña
Assistant U.S. Attorney

cc: Karen Atkinson, Esq.

Podhurst Orseck
TRIAL & APPELLATE LAWYERS

Aaron S. Podhurst
Robert C. Josefsberg
Joel D. Eaton
Steven C. Marks
Victor M. Diaz, Jr.
Katherine W. Ezell
Stephen F. Rosenthal
Ricardo M. Martínez-Cid
Ramon A. Rasco
Alexander T. Rundlet
John Gravante, III
Carolina Maharbiz

Robert Orseck (1934-1978)

Walter H. Beckham, Jr.
Karen Podhurst Dern
Of Counsel

August 4, 2009

Storage USA
[REDACTED]

To Whom It May Concern,

It has come to our attention that Mr. Jeffrey E. Epstein leases one or more of your storage units. Mr. Epstein is the defendant in civil law suits involving the sexual exploitation of victims represented by undersigned attorneys. Pursuant to Judge Kenneth Marra's Preservation Order (attached hereto), the items stored in Mr. Epstein's storage unit(s) must be preserved. Preservation includes taking reasonable steps to prevent the partial or full destruction, alteration, testing, deletion, shredding, incineration, wiping, relocation, theft, or mutation of any material, as well as negligent or intentional handling that would make material incomplete or inaccessible.

Should Mr. Epstein cease to pay his storage fees, Storage USA is still required to preserve and maintain, and not destroy, alter, or dispose of anything in any of his storage units, as well as any correspondence, records or contracts with Defendant Epstein.

Please be advised that failure to abide by this request could result in penalties and/or sanctions against your company and could form the basis of legal claims for spoilation.

Thank you for your cooperation.

Sincerely,



Katherine Ezell

KWE/mce
cc: Robert Critton, Esq.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 6,

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 7,

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

C.M.A.,

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE,

Plaintiff,

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

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. II,

Plaintiff,

CASE NO.: 08-CV-80469-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 101,

Plaintiff,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

Plaintiff,

CASE NO.: 09-CV-80656-MARRA/JOHNSON

vs.

JEFFREY EPSTEIN,

Defendant.

ORDER

THIS CAUSE comes before the Court on Plaintiffs Jane Doe No. 101 and Jane Doe No. 102's Motion for an Order for the Preservation of Evidence and Incorporated Memorandum of Law (DE 114), filed May 26, 2009, and the Court's Order (DE 192), entered July 6, 2009. The parties are in agreement as to a substantial part of the language in their proposed orders, and the Court has carefully considered the motion, the proposed orders, and is otherwise fully advised in the premises.

It is **ORDERED AND ADJUDGED** that Plaintiffs' Motion (DE 114) is **GRANTED** as follows:

- A. Defendant, Jeffrey Epstein, and his employees, his agents, and his attorneys are directed to take every reasonable step to preserve all evidence relevant to these cases that have been filed in federal court or that may lead to the discovery of admissible evidence relevant to these cases, which includes evidence related to the October 25, 2005 search, documents, data, and tangible things, including writings; records; files; correspondence; digital or chemical process photographs (including negatives); reports; memoranda; calendars; diaries; minutes; electronic messages; voicemail; e-mail; telephone message records or logs; computer and network activity logs; hard drives; backup data; removable computer storage media, such as tapes, disks, and cards; printouts; document image files; web pages; databases; spreadsheets; software;

books; ledgers; journals; orders; invoices; bills; vouchers; checks; statements; worksheets; summaries; compilations; computations; charts; diagrams; graphic presentations; drawings; films; charts; video, phonographic, tape, or digital recordings or transcripts thereof; drafts; jottings; and notes. Information that serves to identify, locate, or link such material, such as file inventories, file folders, indices, and metadata, is also included. Specifically, Defendant must preserve the following evidence: records of phone communications; records of domestic and international travel, including travel in Defendant's private airplanes; former and current employee records; tax returns; medical bills; bills regarding any other expenses related in any way to these Plaintiffs; all documents evidencing payment by Defendant of U.S. currency and/or merchandise to each person on the list of victims provided by the United States Attorney's Office ("USAO list"); any evidence stored in Defendant's storage unit; all photographs of the interior and exterior of Defendant's Palm Beach mansion as it appeared in 1998 through October 2005; any diary, log, memo pad, calendar, or other writing reflecting the date that each person on the USAO list visited Defendant's mansion; any diary or document wherein each victim on the USAO list wrote regarding any visit(s) to Defendant's mansions; all documents sent to or by the Palm Beach Police Department ("PBPD"), the FBI, the USAO, or the Palm Beach State Attorney's Office ("PBSAO") to or by the Defendant; and all computers used by Defendant and/or his agents and/or employees during 1998 through and including October 25, 2005, the date of the search warrant.

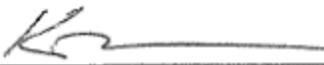
B. The duty to preserve evidence extends to documents, data, and tangible things in the

possession, custody, and/or control of the parties to this action and any employees, agents, or attorneys who possess materials reasonably anticipated to be subject to discovery in these actions. Counsel shall be directly responsible only to the extent they are in possession or control of evidence. Counsel shall provide a copy of this Order to Defendant and those employees or agents whom defense counsel knows, or has reason to know, may have evidence.

- C. "Preservation" is to be interpreted broadly to accomplish the goal of maintaining the integrity of all documents, data, and tangible things reasonably anticipated to be subject to discovery in these actions under Rules 26, 45, and 56(e) of the Federal Rules of Civil Procedure.
- D. If an objection or privilege is raised, the parties may raise the issue with this Court in a timely fashion and shall preserve the evidence in question pending resolution by the Court. An agreement to preserve evidence and this Order is not a waiver of any right to object to production.
- E. The parties, without leave of Court, may agree in writing that certain documents or categories of evidence need not be preserved as otherwise required by this Order. If such agreement is reached, such agreement is effective upon signing and without further order of this Court.
- F. If this Court determines that evidence has been destroyed or lost in violation of this Order, it may impose appropriate sanctions based upon motion and an evidentiary hearing, if necessary.

G. Each party shall bear its own costs for complying with this Order.

DONE AND ORDERED in Chambers at West Palm Beach, Palm Beach County,
Florida, this 30th of July, 2009.



KENNETH A. MARRA
United States District Court Judge

Copies to:
All counsel of record

2009 JUL 30 11:54 AM
2009

**Epstein Matter
Depositions Currently Scheduled
as of August 7, 2009**

Plaintiff	Deponent	Date and Time	Location	Remarks
Doe 101, 102 & BB	Alfredo Rodriguez, continued video depo	8/7/09,1:00p.m.	Kress Court Rep [REDACTED]	Noticed by Josefsberg,Kuvin
Doe and Doe 101, 102	Leslie Wexler By video	8/14/09,11:00a.m .Cancelled but no notice yet	McGinnis & Assoc. [REDACTED]	Noticed by Edwards, cross notice by Josefsberg, U.S.Legal
- same -	Ghislane Noelle Maxwell By video	8/17/09,11:00a.m	Esquire Court Rep [REDACTED]	- same -
- same -	Glenn Russell Dubin By video	8/18/09 11:00a.m	- same -	- same -
B.B.	Donald Trump	8/18/09,11:00a.m	- same -	Noticed by Kuvin
B.B.	[REDACTED] By video	8/20/09,10:00a.m	Leonold Kuvin, P.A. [REDACTED]	- same -
B.B.	[REDACTED] By video	9/01/09,11:00a.m	Esquire Court Rep [REDACTED]	- same -

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

B.B

Case No: 502008CA037319XXXXMB AB

Plaintiff,

vs.

JEFFREY EPSTEIN

Defendant.

PLAINTIFF'S NOTICE OF TAKING CONTINUED VIDEOTAPED DEPOSITION

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

NAME:

Alfredo Rodriguez

DATE AND TIME:

August 7, 2009
1:00 PM

LOCATION:

Kress Court Reporting
[REDACTED]

upon an oral examination before 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.

I HEREBY CERTIFY that a true and correct copy of this Notice was faxed and mailed this 5 day of August, 2009 to: Jack A. Goldberger, Esq., [REDACTED]; Bruce E. Reinhart, Esq., [REDACTED]; Robert D. Critton, Jr., Michael J. Pike, [REDACTED]

LEOPOLD-KUVIN, P.A.
[REDACTED]
[REDACTED]

By: 

SPENCER T. KUVIN, ESQ.
Florida Bar No: 089737

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

BB,
Plaintiff,

Case No: 502008CA 37319XXXX MB AB

Florida Bar No: 089737

vs.

JEFFRY EPSTEIN,

Defendant.

PLAINTIFF'S NOTICE OF TAKING DEPOSITION

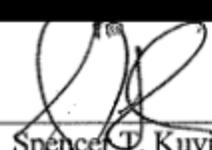
PLEASE TAKE NOTICE THAT THE UNDERSIGNED ATTORNEY WILL TAKE THE DEPOSITION OF:

<u>NAME:</u>	<u>DATE AND TIME:</u>	<u>LOCATION:</u>
DONALD TRUMP	August 18, 2009 11:00 AM	Esquire Court Reporters, One [REDACTED]

upon an oral examination before a Notary Public or officer authorized by law to take depositions in the State of New York. 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 5
day of August, 2009 to Jack A. Goldberger, Esq., [REDACTED];
[REDACTED]; Bruce E. Reinhart, Esq., [REDACTED];
[REDACTED]; Robert D. Critton, Jr., Michael J. Pike, [REDACTED].

LEOPOLD-KUVIN, P.A.
[REDACTED]

By: 
Spencer T. Kuvin, Esq.
FL Bar No.: 089737

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

B.B.

Plaintiff,

Case No: 502009CA037319XXXXMB AB

vs.

JEFFREY EPSTEIN,

Defendant.

PLAINTIFF'S NOTICE OF TAKING VIDEOTAPED DEPOSITION

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

NAME:

[REDACTED]

DATE AND TIME:

September 1, 2009
11:00 AM

LOCATION:

Esquire Court Reporters, [REDACTED]

[REDACTED]

upon an oral examination before a Notary Public or officer authorized by law to take depositions in the State of New York. 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 5
day of August, 2009 to: Jack A. Goldberger, Esq., [REDACTED] alm

[REDACTED] Bruce E. Reinhart, Esq., [REDACTED]
[REDACTED] Robert D. Critton, Jr., Michael J. Pike, [REDACTED]

LEOPOLD-KUVIN, P.A.

[REDACTED]

By: _____


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

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

*cc - JE, DI
dipo*

JANE DOE NO. 6,

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 7,

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

C.M.A.,

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. II,

CASE NO.: 08-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 101,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CROSS-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that at the below listed time and place the Plaintiff, JANE DOE NO. 101 and JANE DOE NO. 102, by and through undersigned counsel, will take the

depositions of:

NAME OF DEPONENT

DATE AND TIME

PLACE OF DEPOSITION

Glenn Russell Dubin

Tuesday
August 18, 2009
11:00 a.m.

Esquire Court Reporters


upon oral examination before US LEGAL SUPPORT, Court Reporters, Notary Public, or any other 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. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this ^{5th} ~~30th~~ day of ^{August} ~~July~~, 2009, a copy of the foregoing was

served this day on all counsel of record identified on the attached Service List either via e-mail and/or U.S. mail.

Respectfully submitted,

PODHURST ORSECK, P.A.
*Attorneys for Plaintiffs Jane Doe No. 101
and Jane Doe No. 102*

By: Katherine W. Ezell for RLJ

Robert C. Josefsberg
Fla. Bar No. 040856

Katherine W. Ezell
Fla. Bar No. 114771

City National Bank Building

Telephone: [REDACTED]
Facsimile: [REDACTED]

SERVICE LIST

JANE DOE NO. 2 v. JEFFREY EPSTEIN
Case No. 08-CV-80119-MARRA/JOHNSON
United States District Court, Southern District of Florida

Via Regular mail and e-mail to:

Robert Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman LLP

[REDACTED]
[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Defendant, Jeffrey Epstein

Via email to:

Jack Scarola, Esq.
Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.

[REDACTED]
[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in related Case No. 08-80811

Adam Horowitz, Esq.
Stuart Mermelstein, Esq.
Mermelstein & Horowitz, P.A.

[REDACTED]
[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiffs in Related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Spencer Todd Kuvin, Esq.
Theodore Jon Leopold, Esq.
Leopold Kuvin, P.A.
2925 PGA Boulevard, Suite 200
Palm Beach Gardens, FL 33410

Phone: [REDACTED] / Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-08804

Richard Willits, Esq.
Richard H. Willits, P.A.

[REDACTED]
Phone: [REDACTED] / Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80811

Brad Edwards, Esq.
Rothstein Rosenfeldt Adler

[REDACTED]
Phone: [REDACTED] / Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80893

Isidro Manuel Garcia, Esq.
Garcia Elkins & Boehringer

[REDACTED]
Phone: [REDACTED] / Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80469

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

cc - 1e, 11

_____/

JANE DOE NO. 6,

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 7,

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

C.M.A.,

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. II,

CASE NO.: 08-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 101,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CROSS-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that at the below listed time and place the Plaintiff, JANE DOE NO. 101 and JANE DOE NO. 102, by and through undersigned counsel, will take the

depositions of:

<u>NAME OF DEPONENT</u>	<u>DATE AND TIME</u>	<u>PLACE OF DEPOSITION</u>
Leslie Wexner	Friday August 14, 2009 11:00 a.m.	McGinnis & Associates 

upon oral examination before US LEGAL SUPPORT, Court Reporters, Notary Public, or any other 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. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this ^{5th}~~30th~~ day of ^{August}~~July~~, 2009, a copy of the foregoing was

served this day on all counsel of record identified on the attached Service List either via e-mail and/or U.S. mail.

Respectfully submitted,

PODHURST ORSECK, P.A.
*Attorneys for Plaintiffs Jane Doe No. 101
and Jane Doe No. 102*

By: Katherine W. Ezell by KWE
Robert C. Josefsberg
Fla. Bar No. 040856
[REDACTED]
Katherine W. Ezell
Fla. Bar No. 114771
[REDACTED]
City National Bank Building
[REDACTED]
Miami, FL [REDACTED]
Telephone: [REDACTED]
Facsimile: [REDACTED]

SERVICE LIST

JANE DOE NO. 2 v. JEFFREY EPSTEIN
Case No. 08-CV-80119-MARRA/JOHNSON
United States District Court, Southern District of Florida

Via Regular mail and e-mail to:

Robert Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman LLP

[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Defendant, Jeffrey Epstein

Via email to:

Jack Scarola, Esq.
Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.

[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in related Case No. 08-80811

Adam Horowitz, Esq.
Stuart Mermelstein, Esq.
Mermelstein & Horowitz, P.A.

[REDACTED]
Phone: [REDACTED] Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiffs in Related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Spencer Todd Kuvin, Esq.
Theodore Jon Leopold, Esq.
Leopold Kuvin, P.A.

[REDACTED]
Phone: [REDACTED]

/Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-08804

Richard Willits, Esq.
Richard H. Willits, P.A.

[REDACTED]
Phone: [REDACTED]

/Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80811

Brad Edwards, Esq.
Rothstein Rosenfeldt Adler

[REDACTED]
Phone: [REDACTED]

/Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80893

Isidro Manuel Garcia, Esq.
Garcia Elkins & Boehringer

[REDACTED]
Phone: [REDACTED]

/Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in Related Case No. 08-80469

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 3,

CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 4,

CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 5,

CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

cc-SENT

_____/

JANE DOE NO. 6,

CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE NO. 7,

CASE NO.: 08-CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

C.M.A.,

CASE NO.: 08-CV-80811-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____/

JANE DOE,

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

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. II,

CASE NO.: 08-CV-80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 101,

CASE NO.: 09-CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

JANE DOE NO. 102,

CASE NO.: 09-CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CROSS-NOTICE OF TAKING VIDEOTAPED DEPOSITION

PLEASE TAKE NOTICE that at the below listed time and place the Plaintiff, JANE DOE NO. 101 and JANE DOE NO. 102, by and through undersigned counsel, will take the

depositions of:

<u>NAME OF DEPONENT</u>	<u>DATE AND TIME</u>	<u>PLACE OF DEPOSITION</u>
Ghislane Noelle Maxwell	Monday August 17, 2009 11:00 a.m.	Esquire Court Reporters 

upon oral examination before US LEGAL SUPPORT, Court Reporters, Notary Public, or any other 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. This deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this ^{5th} ~~30th~~ day of ^{August} ~~July~~, 2009, a copy of the foregoing was

served this day on all counsel of record identified on the attached Service List either via e-mail and/or U.S. mail.

Respectfully submitted,

PODHURST ORSECK, P.A.
*Attorneys for Plaintiffs Jane Doe No. 101
and Jane Doe No. 102*

By: Katherine W. Ezell for RLJ

Robert C. Josefsberg
Fla. Bar No. 040856

Katherine W. Ezell
Fla. Bar No. 114771

City National Bank Building

Telephone: [REDACTED]

Facsimile: [REDACTED]

SERVICE LIST

JANE DOE NO. 2 v. JEFFREY EPSTEIN
Case No. 08-CV-80119-MARRA/JOHNSON
United States District Court, Southern District of Florida

Via Regular mail and e-mail to:

Robert Critton, Esq.
Michael J. Pike, Esq.
Burman, Critton, Luttier & Coleman LLP

[REDACTED]
Phone: [REDACTED] /Fax: [REDACTED]
[REDACTED]

Counsel for Defendant, Jeffrey Epstein

Via email to:

Jack Scarola, Esq.
Jack P. Hill, Esq.
Searcy Denney Scarola Barnhart & Shipley, P.A.

[REDACTED]
Phone: [REDACTED] /Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiff in related Case No. 08-80811

Adam Horowitz, Esq.
Stuart Mermelstein, Esq.
Mermelstein & Horowitz, P.A.

[REDACTED]
Phone: [REDACTED] /Fax: [REDACTED]
[REDACTED]

Counsel for Plaintiffs in Related Cases Nos. 08-80069, 08-80119, 08-80232, 08-80380, 08-80381, 08-80993, 08-80994

Spencer Todd Kuvin, Esq.
Theodore Jon Leopold, Esq.
Leopold Kuvin, P.A.

Phone: [REDACTED]

Fax: [REDACTED]

Counsel for Plaintiff in Related Case No. 08-08804

Richard Willits, Esq.
Richard H. Willits, P.A.

Phone: [REDACTED]

Fax: [REDACTED]

Counsel for Plaintiff in Related Case No. 08-80811

Brad Edwards, Esq.
Rothstein Rosenfeldt Adler
401 E. Las Olas Blvd., Suite 1650
Fort Lauderdale, FL 33301-4252
Phone: [REDACTED] / Fax: (954) 527-8663

Counsel for Plaintiff in Related Case No. 08-80893

Isidro Manuel Garcia, Esq.
Garcia Elkins & Boehringer

Phone: [REDACTED]

Fax: [REDACTED]

Counsel for Plaintiff in Related Case No. 08-80469