

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

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

JANE DOE NO. 5,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF'S SIXTH SUPPLEMENTAL RESPONSE
TO DEFENDANT'S FIRST REQUEST TO PRODUCE**

Plaintiff, JANE DOE 5, by and through her undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 34, hereby submits her Sixth Supplemental Response to Defendant, JEFFREY EPSTEIN'S, First Set of Request for Production to Plaintiffs as follows:

General Objections

1. Plaintiff objects to Defendant's First Request for Production of Documents to the extent that the Requests call for the disclosure of information protected by the attorney-client privilege, attorney work-product doctrine, or other applicable privilege or immunity, whether created by statute or common law. Plaintiff claims such privileges and protections to the extent implicated by each Request, and excludes privileged and protected information from any responses to Defendant's discovery. Any disclosure is inadvertent and is not intended to waive those privileges or protections, which are specifically reserved.

2. Plaintiff objects to Defendant's First Request for Production of Documents to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

3. Plaintiff objects to Defendant's First Request for Production of Documents to the extent that the requests seek to impose obligations beyond those imposed by applicable law and the applicable Rules of Civil Procedure.

4. The foregoing general objections are incorporated into each of the specific objections and responses that follow. The stating of a specific objection or response shall not be construed as a waiver of Plaintiff's general objections. Plaintiff reserves the right to supplement these responses and to make further objections. Plaintiff's responses shall neither waive nor prejudice any objections that Plaintiff may later assert.

5. Plaintiff reserves the right to supplement or amend its Responses and Objections to Defendant's Discovery as and if additional information becomes available.

Subject to and without waiving any of the foregoing objections, which Plaintiff hereby incorporates into each Interrogatory set forth below, Plaintiff responds to Defendant's First Request for Production of Documents as follows:

**PLAINTIFF'S SIXTH SUPPLEMENTAL RESPONSE
TO DEFENDANT'S FIRST REQUEST TO PRODUCE**

5. All medical reports and/or records from doctors, physicians, (including psychologists, psychiatrists, mental health counselors), hospitals, drug or alcohol facilities or any other person or entity who has rendered treatment to or examined you for any reason after the incident(s) which is the subject matter of this lawsuit.

Response:

Supplemental documents that are responsive to Defendant's Request for Production are attached.

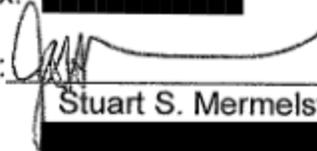
April 12, 2010

Respectfully submitted:

MERMELSTEIN & HOROWITZ P.A.

Tel. [REDACTED]

Fax: [REDACTED]

By: 

Stuart S. Mermelstein

Florida Bar No. 947245

Adam D. Horowitz

Florida Bar No. 376980

Jessica D. Arbour

Florida Bar No. 67885

Certificate of Service

WE HEREBY CERTIFY that a true copy of the foregoing has been sent via U.S. Mail to the following addressees this 12 day of April, 2010.

Robert D. Critton, Jr, Esq.
Burman, Critton, Luttier & Coleman

[REDACTED]

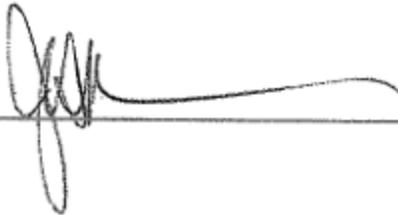
Co-Counsel for Defendant Jeffrey Epstein

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.

[REDACTED]

Fax: [REDACTED]

Co-Counsel for Defendant Jeffrey Epstein



A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above a solid horizontal line.

HERMAN & MERMELSTEIN PA
ATTORNEYS AT LAW

*Sup to
Bill to*

49439



Tel [Redacted]
Fax [Redacted]



www.hermanlaw.com

November 19, 2008

VIA U.S. MAIL



Re



Dear Sir/Madam:

The above named firm represents [Redacted] in a civil legal action. Enclosed please find a HIPAA compliant authorization for release of information. Please provide our office with her entire file *including billing records*. Of course, we will be happy to pay for any photocopying charges associated with this production. In addition, I would appreciate any efforts you can take to expedite this request.

I look forward to hearing from you.

Very truly yours,
Ron Jacobs

Ron Jacobs, Paralegal

/rj
Encls.

*HP
11/25/08
3-4*

HIPAA COMPLIANT AUTHORIZATION FOR RELEASE OF INFORMATION

I, [REDACTED] hereby authorize you to furnish full and complete file records, medical records including records containing private health information, policy information, employment information, plan documents, and any and all other information, or a copy, to Jeffrey M. Herman and Herman & Mermelstein, P.A., to whom I authorize the release of all records, at the following address:

Herman & Mermelstein, P.A.
[REDACTED]

Tel: [REDACTED]

Fax: [REDACTED]

For the purposes of this authorization, "information" means all records or knowledge concerning my health or employment, any benefit plans, any benefit claims, any injuries, medical history, mental and physical conditions, before and after the date of this authorization, regardless of the time of occurrence. For purposes of this authorization, the term "records" includes, but is not limited to, written or graphic documentation, including notes, billing records or statements, sound recordings, computer records and diagnostic documentation such as X-rays, lab test results, or other test results. This authorization also extends to the release of any records received by you from other providers. This authorization includes your entire file, without exception, for all dates of treatment.

You are requested to cooperate and communicate directly with Jeffrey M. Herman and Herman & Mermelstein, P.A., and furnish such information as may be requested and to assist in the collection of any and all information requested. You should not disclose information to any other person without my written authorization unless required by law to do so. This authorization shall expire one (1) year from the date I sign this form.

The information requested in this Authorization is for use in a legal proceeding. I agree that: (1) This authorization overrides any existing agreement to restrict information pursuant to 45 CFR 164.502(b)(2)(ii); (2) I understand that I have a right to revoke this authorization in writing by mailing the revocation to Herman & Mermelstein, P.A.; (3) A copy of this authorization is as valid as an original; and (3) I have read and understood this authorization.

3/28/08
Date

[REDACTED]

