

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

CASE NO. 502008CA028058XXXXMB AB

E.W.,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

EPSTEIN'S MOTION TO COMPEL
ANSWERS TO FOURTH SET OF INTERROGATORIES

Defendant, JEFFREY EPSTEIN ("Epstein"), pursuant to Fla. R. Civ. P. 1.380, moves to compel Plaintiff, E.W. to answer Epstein's Fourth Set of Interrogatories and states:

1. On February 25, 2010, Epstein propounded his Fourth Set of Interrogatories on EW (attached as **Exhibit A**).
2. On April 1, 2010, EW served Answers to Defendant's Fourth Interrogatories (attached as **Exhibit B**).
3. Epstein moves to compel EW to provide a better answer to Interrogatory

No. 1:

List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008; this includes listing any and all sources of income you have received.

ANSWER

T's Lounge
West Palm Beach, FL
2009

Diamond Dolls
Coconut Creek, FL
2009

Roxy's Bar & Grill
Coconut Creek, FL
2009

ACG
West Palm Beach, FL
2010 – present

4. EW failed to provide an adequate answer to Interrogatory No. 1 as she did not include any business addresses, telephone and cell phone numbers, immediate supervisors (name and address) and rates of pay nor did she object to the interrogatory.

5. Moreover, it is unclear what business or entity EW is referring to by her answer "ACG, West Palm Beach, FL."

6. Rule 1.380(a)(3), Florida Rules of Civil Procedure, provides that "...an evasive or incomplete answer shall be treated as a failure to answer."

7. Accordingly, Epstein moves, pursuant Fla. R. Civ. P. 1.380(a)(2), for an order compelling EW to answer Interrogatory No. 1.

WHEREFORE, Defendant, JEFFREY EPSTEIN, requests the Court enter an order compelling Plaintiff, E.W., to fully answer Interrogatory No. 1 and grant any additional relief the Court deems just and proper.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 27th day of April, 2010:

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
424 N. Andrews Avenue, Suite 2

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400

Fort Lauderdale, FL 33301

[Redacted]
[Redacted] - fax
[Redacted]

Counsel for Plaintiff

Jay Howell, Esq.
Jay Howell & Associates, P.A.
644 Cesery Boulevard
Suite 250
Jacksonville, FL 32211

[Redacted] Phone
[Redacted] Fax

Co-counsel for Plaintiff

West Palm Beach, FL 33401-5012

Fax: [Redacted]

Co-Counsel for Defendant Jeffrey Epstein

BURMAN CRITTON LUTTIER & COLEMAN, LLP

303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

[Redacted] Fax

By: _____

Robert D. Critton, Jr.
Florida Bar #224162
Michael J. Pike
Florida Bar #617296
David A. Yarema
Florida Bar #12492

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

E.W.,

CASE NO. 502008CA028058XXXMB AB

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**DEFENDANT'S NOTICE OF SERVING
FOURTH SET OF INTERROGATORIES TO PLAINTIFF**

Defendant, Jeffrey Epstein, (hereinafter "Mr. Epstein"), files this Notice of Serving Fourth Set of Interrogatories to Plaintiff E.W., pursuant to Rule 1.340, Florida Rules of Civil Procedure, and request the Plaintiff to answer said interrogatories in writing within thirty (30) days from date of service hereof.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by U.S. Mail to the following addressees on this 25th day of February, 2010:

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Avenue, Suite 2
Fort Lauderdale, FL 33301
954-524-2820
954-524-2822 – fax
brad@pathtojustice.com
Counsel for Plaintiff

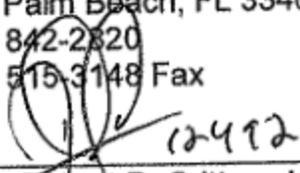
Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, ■■■
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
Fax: 561-835-8691
Co-Counsel for Defendant Jeffrey Epstein

Jay Howell, Esq.
Jay Howell & Associates, ■■■
644 Cesery Boulevard
Suite 250
Jacksonville, FL 32211

EXHIBIT A

904-680-1234 Phone
904-680-1238 Fax
Co-counsel for Plaintiff

**BURMAN, CRITTON, LUTTIER
& COLEMAN, LLP**
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401
(561) 842-2820
(561) 515-3148 Fax

By: 

~~Robert D. Critton, Jr.~~
Florida Bar #224162
Michael J. Pike
Florida Bar #617296

(Counsel for Defendant Jeffrey Epstein)

DEFINITIONS AND INSTRUCTIONS

1. The term "Plaintiff" refers to E.W., and all her agents, employees, representatives, attorneys, accountants or anyone else acting on their behalf.
2. The term "Defendant" refers to Jeffrey Epstein and all his agents, representatives, employees, assigns, or other person or persons acting or purporting to act on its behalf.
3. The words "and" and "or" shall be construed both conjunctively and disjunctively so as to make the request inclusive rather than exclusive. The singular shall be construed to include the plural and the plural to include the singular.
4. The word "communication(s)" shall mean any oral or written statement or exchange of information of any type between two or more persons, including but not limited to documents, telephone or face-to-face conversations, meetings or conferences.
5. The word "document" shall mean any writing of every kind, including, but not limited to, any letter, book, record, report, file folder, envelope, file cabinet drawer label, memorandum, correspondence, communication, drawing, chart, draft, schedule, photograph, tape, disc, card, wire, computer program computer printout and any other electronic or mechanical recording or transcript of any other instrument or device from which information can be perceived or which is used to memorialize human thought, speech or action in the possession, custody, or control of Plaintiff. The term "document" also includes copies containing information in addition to that contained on the original and all the attachments, enclosures, or documents referred to in any document. The term "document" is also defined to be synonymous in meaning and equal in scope to

the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

6. The word "person" shall mean any natural person, individual, proprietorship, partnership, corporation, association, organization, joint venture, business trust or other business enterprise, governmental body or agency, or governmental, public, legal, or business entity, or group of natural persons or other entities whether *sui juris* or otherwise.

7. The phrase "relate to" shall mean refer to, contain, allude to, respond to, comment upon, discuss, show, disclose, explain, mention, analyze, constitute, comprise, evidence, set forth, summarize, support, refute or characterize, either directly or indirectly, in whole or in part.

8. "Identify," when used to refer to a natural person, means to state the following:

- (a) his or her full name and address (or, if the present address is not know, his or her last known address);
- (b) the full name and address of each of his or her employers, each corporation of which he or she is an officer or director, and each business in which he or she is a principal;
- (c) his or her present position (or if the present position is not known, his or her last known position(s) at the time of the act to which the Interrogatory response relates).
- (d) Such other information sufficient to enable Defendant to identify the person.

9. "Identify" when used to refer to any entity other than a natural person means to state the following:

- (a) The full name of the entity, the type of the entity (e.g., corporation, partnership, etc.), the address of its principle place of business, its principle business activity, and if it is a corporation, the jurisdiction under which it has been organized and the date of incorporation.

10. "Identify," when used with reference to a Document or Communication

means to state the following:

- (a) the nature of the document (e.g., letter, memorandum, etc), date of creation, author, place of preparation, the name and address of each addressee;
- (b) The identity of each signatory;
- (c) The title or heading of the document;
- (d) the general substance and subject matter;
- (e) Its present location and custodian (or, if not know, the last known);
- (f) the identity of each person to whom a copy of the document was sent and each date of its receipt and date of its transmittal or other disposition;
- (g) The circumstance of each such receipt and each transmittal or other disposition, including identity of the person transmitting and receiving it.

11. In lieu of identifying any document, Plaintiff may attach a true and correct copy of such document as an exhibit to its response to these Interrogatories, along with an explicit reference to the Interrogatory to which each document is responsive.

12. If the response to all or part of any Interrogatory is not known at the time the initial response is made, please include a statement to that effect, furnish the information that is known or available, and respond to the Interrogatory by amended or supplemental response in writing under oath within ten (10) days of the date on which the complete response becomes known or available.

3. List separately the names, addresses and phone numbers of all males, excluding Mr. Epstein, with whom you have had sexual activity since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008 up through the current date. Describe the nature of sexual activity, the date(s) and whether you received money or other consideration from the person.

4. Are you now, or have you ever been a member of a social networking website such as [REDACTED], [REDACTED], [REDACTED], [REDACTED] or any similar websites?

a. If so, please list all social networking websites of which you are currently a member; list all social networking websites of which you were previously a member and state the date you joined each site and the date you cancelled your membership with each site.

b. Also, please list all usernames, screen names or "handles" you used for each social networking site of which you were ever a member. Also, please provide all uniform resource locators ("URL") for each social networking website of which you are, or were previously a member (i.e. [REDACTED]).

5. Are you now, or have you ever been a member of an online dating website such as [REDACTED], [REDACTED], [REDACTED] or any similar website?
- a. If so, please list all online dating websites of which you are currently a member; list all online dating websites of which you were previously a member and state the date you joined each site and the date you cancelled your membership with each site.
- b. Also, please list all usernames, screen names or "handles" you used for each online dating website of which you were ever a member. Also, please provide all URLs for each social networking website of which you are, or were previously a member (i.e. [REDACTED]).
6. Do you, or have you ever kept, a diary or journal since 2002? If so, please state whether the diary or journal was/is kept in hard copy or whether it was/is kept on a computer or other electronic device.
- a. If the diary or journal was kept in hard copy, describe its physical attributes (i.e. book, collection of loose paper, day planner) and state its current location.

- b. If the diary or journal was/is kept on a computer or other electronic device, please identify the computer or electronic device, including the make and model; identify the owner of the computer or electronic device; and state the current location of the computer or electronic device. If the current location is unknown, please state the last known location of the computer or electronic device.

 - c. Identify all individuals, including their full name, current address, home telephone number and cellular telephone number, that have read any portion of the diary or journal.

 - d. Please state whether any copies were made of the diary or journal. If so, state the number of copies made and identify all individuals, including their full name, current address, home telephone number and cellular telephone number, who have, or at any time had, a copy of the diary or journal.
10. Please identify all computers you have used since 2002 and identify the owner of each computer; state the make, model and current location of each computer; if the current location of a particular computer is unknown, state each location in which you used last used each computer.

11. Please identify your five closest friends for the years 2006 – 2010, including their full name, current address, home telephone number and cellular telephone number.

12. Do you intend to call at trial other females who went to Mr. Epstein's residence? If so, please identify each individual, including their name, current address, home telephone number and cellular telephone number, and identify her counsel. Also, please state the substance of each witness's testimony.

VERIFICATION

By: _____

STATE OF FLORIDA)
) ss
COUNTY OF PALM BEACH)

SWORN TO AND SUBSCRIBED before me this ____ day of _____, 2010 by _____, who is personally known to me or has produced the following identification _____ which is current or has been issued within the past five years and bears a serial or other identifying number.

Print Name

Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)

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

CASE NO: 502008CA028058XXXMB AB

E.W.

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**NOTICE OF SERVICE OF PLAINTIFF'S VERIFIED ANSWERS TO
DEFENDANT'S FOURTH INTERROGATORIES**

Plaintiff, E.W., hereby files her Notice of Service of Plaintiff's Answers to Fourth Interrogatories propounded by Defendant on February 25, 2010.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the above and a copy of the foregoing has been provided this 1^{**} day of April 2010 via U.S. Mail and email transmittal to all those on the attached service list

Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, [REDACTED]
425 N. Andrews Ave., Suite 2
Fort Lauderdale, FL 33301
(954) 524-2820
(954) 524-2822 fax
[REDACTED]

By:



BRADLEY J. EDWARDS
Florida Bar No.: 542075

EXHIBIT B

SERVICE LIST

Robert D. Critton, Jr.
BURMAN, CRITTON, et al.
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

Jay Howell, Esq.
Jay Howell & Assoc.
644 Cesery Boulevard
Suite 250
Jacksonville, FL 32211

Jack Alan Goldberger, Esq.
Atterbury Goldberger et al.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401

PLAINTIFF'S ANSWERS TO FOURTH INTERROGATORIES

1. List the names, business addresses, telephone and cell phone numbers, dates of employment, immediate supervisor (name and address) and rates of pay regarding all employers, including self-employment, for whom you have worked since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008; this includes listing any and all sources of income you have received.

ANSWER:

T's Lounge
West Palm Beach, FL
2009

Diamond Dolls
Coconut Creek, FL
2009

Roxy's Bar & Grill
Coconut Creek, FL
2009

ACG
West Palm Beach, FL
2010 - present

2. Identify¹ each physician or medical provider (including mental health professionals, drug or alcohol counselors and therapists) with whom you have consulted or who has treated or examined you, and identify each facility (including drug or alcohol treatment facilities, whether inpatient or outpatient) where you have received any consultation, examination or treatment that is in any way related to this case; and state as to each the date of consultation, examination or treatment and the injury, condition or other reason for which you were examined or treated since you answered the First Set of Interrogatories propounded by Defendant on or about December 10, 2008.

ANSWER:

Randee Speciale
Victim's Services
West Palm Beach, FL
Dates reflected in records previously produced.

Dr. Amy C. Swan, [REDACTED].
918 N. E. 26th Avenue
Fort Lauderdale, FL 33304
Dates reflected in records.

Interrogatories 3-12

ANSWERS:

Objection, beyond the limit of Interrogatories allowed pursuant to FRCP 1.340.

VERIFICATION

By: Courtney E Wild

STATE OF FLORIDA)
) ss
COUNTY OF ~~PALM BEACH~~ Broward)

SWORN TO AND SUBSCRIBED before me this 30th day of March 2010 by Courtney Wild, who is personally known to me or has produced the following identification DL# W430-105-87-883 which is current or has been issued within the past five years and bears a serial or other identifying number.

Norka Silverio
Print Name
Norka A. Silverio
Signature

NOTARY PUBLIC - STATE OF FLORIDA
Commission Number:
My commission expires:
(Notarial Seal)

Courtney E Wild

