

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

B.B.,

CASE NO. 502008CA037319XXXMB AB

Plaintiff,

v.

JEFFREY EPSTEIN,
and [REDACTED],

Defendants.

DEFENDANT'S SECOND REQUEST TO PRODUCE TO PLAINTIFF

Defendant, Jeffrey Epstein (hereinafter "Mr. Epstein"), by and through his undersigned attorneys requests Plaintiff, B.B., pursuant to Rule 1.350, Florida Rules of Civil Procedure, produce the following within thirty (30) days from the date hereof.

DEFINITIONS AND INSTRUCTIONS

A. "Document" means any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including the **originals** and all non-identical copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, letters, purchase orders, telegrams, teletype, telefax bulletins, e-mails, electronic data, meetings, reports, or other communications, interoffice and intra-office telephone calls, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, returns, trade information regarding fabric, carpets, samples etc..., computer printouts, prospectuses, financial statements, schedules, affidavits,

contracts, cancelled checks, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphs or aural records or representations of any kind, including, without limitation, photographs, charts, graphs, microfiche, microfilm, video tape, recordings, motion pictures and electronic, mechanical or electric recordings or representations of any kind (including, without limitation, tapes, cassettes, discs and recordings), and including the file and file cover.

The term "Document" also means any and all computer records, data, files, directories, electronic mail, and information of whatever kind whether printed out or stored on or retrievable from floppy diskette, compact diskette, magnetic tape, optical or magnetic-optical disk, computer memory, hard drive, zip drive, jaz drive, orb drive, microdisk, external memory stick, software, or any other fixed or removable storage media, including without limitation, all back-up copies, dormant or remnant files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether the data consists in an active file, deleted file, or file fragment.

B. "Communications" means any oral or written statement, dialogue, colloquialism, discussion, conversation or agreement.

C. "Which relate to" means constitutes, contains, embodies, evidences, supports, reflects, identifies, states, refers to, deals with, or is in any way pertinent to the subject.

D. "Plaintiff" means B.B. and any employee, agent or attorney for B.B. and any other person acting for or on behalf of B.B., or under her authority and control.

F. If it is maintained that any Document which is requested has been destroyed, set forth the contents of the Documents, the date of such destruction and the name of the person who authorized or directed such destruction.

G. If any of the Documents cannot be produced in full, produce to the extent possible, specifying the reasons for the inability to reproduce the remainder.

H. The term "all Documents" means every Document or group of Documents or Communication as defined above known to you.

I. The term "You" and "Your" means the parties to whom this Request for Production of Documents is addressed, including the parties' employees and agents and all other persons acting or purporting to act on the parties' behalf.

J. If all of the Documents requested by any of the request for Documents are not within the possession of the individuals to whom this Request for Production of Documents is addressed, identify each person who has possession of the Documents.

K. If a claim of privilege is asserted as to any Document or Communication requested, identify each Document or Communication for which a privilege is asserted by stating:

1. Its nature (e.g. letter, telegram, memorandum, chart, report, study), date, author, date and place of preparation and the name and address of each addressee, if there is an addressee;
2. The identity of each signer to the Document or Communication;
3. The title or heading of the Document or Communication;
4. The particular characteristics of the Document or Communication substantiating the claim of privilege;
5. Its present (or, if the present is not known, the last known) location and custodian;
6. The identity of each person to whom a copy was sent and each date of its

receipt and each date of its transmittal or other disposition by (1) You and (2) any other person (naming such other person) who, at the time, either received, transmitted or otherwise disposed of such Document or Communication and each copy thereof;

7. The circumstances of each such receipt and each transmittal or other disposition, including identification of the person from whom received and the person to whom transmitted.

L. As used herein, the singular and masculine form of a noun and pronoun shall embrace, and be read and applied as, the plural or feminine or neuter, as circumstances may make appropriate.

Request to Produce

1. All written agreements between you or your counsel and any other plaintiff (or their counsel) that has brought a lawsuit against Jeffrey Epstein in which it was agreed to exchange privileged information without waiving the attorney-client privilege or work product privilege (a/k/a "common interest," "pooled information," or "joint plaintiffs" agreements).
2. All documents and communications between you or your counsel and any other plaintiff (or their counsel) that has brought a lawsuit against Jeffrey Epstein which evidences or mentions an agreement to exchange privileged information without waiving the attorney-client privilege or work product privilege.

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 ^{29th} day of April, 2010:

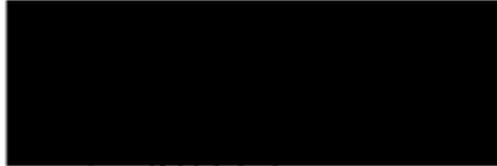
Theodore J. Leopold, Esq.
Spencer T. Kuvin, Esq.
Leopold-Kuvin, P.A.

Fax: [REDACTED]
Counsel for Plaintiff

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

Fax: [REDACTED]
Co-Counsel for Defendant Jeffrey Epstein

**BURMAN, CRITTON, LUTTIER
& COLEMAN, LLP**



By: _____

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

(Counsel for Defendant Jeffrey Epstein)