

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

_____ /

DEFENDANT'S SECOND REQUEST TO PRODUCE TO PLAINTIFF

Defendant, Jeffrey Epstein, (hereinafter "Mr. Epstein"), by and through his undersigned attorneys hereby requests, pursuant to Fed.R.Civ.P. 34, and S.D. Fla. L.R. 26.1.G., Plaintiff, Jane Doe, produce documents within thirty (30) days of service. For purposes of this discovery, Definitions and Instructions are pursuant to S.D. Fla. L.R. 26.1.G.

PRELIMINARY STATEMENT

These requests for production are deemed continuing. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure and applicable law, if any information sought by said requests for production is not learned until after they are answered, or if any answers for any reason should later become incorrect, there shall be a continuing duty on the party answering said requests to supplement or change answers previously submitted.

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 Jane Doe and any employee, agent or attorney for Jane Doe and any other person acting for or on behalf of Jane Doe, 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 has been served by fax and U.S. Mail to the following addressees on this 21st day of April, 2010:

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards,
Fistos & Lehrman, PL
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Paul G. Cassell, Esq.
Pro Hac Vice
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Co-counsel for Plaintiff Jane Doe

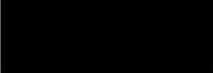
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UNITED STATES DISTRICT COURT
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Defendant.

DEFENDANT'S FOURTH SET OF INTERROGATORIES TO PLAINTIFF

Defendant, Jeffrey Epstein, (hereinafter "Mr. Epstein"), pursuant to Fed.R.Civ.P. 33 and S.D. Fla. 26.1.G., hereby serves this Fourth Set of Interrogatories directed to Plaintiff, Jane Doe, and requests that they be answered separately, fully and under oath within thirty (30) days of service pursuant to Fed.R.Civ.P. 33 and S.D. Fla. L.R. 26.1.G. For purposes of this discovery, Definitions and Instructions are pursuant to S.D. Fla. L.R. 26.1.G.

PRELIMINARY STATEMENT

These interrogatories are deemed continuing. Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure and applicable law, if any information sought by said interrogatories is not learned until after they are answered, or if any answers for any reason should later become incorrect, there shall be a continuing duty on the party answering said interrogatories to supplement or change answers previously submitted.

DEFINITIONS AND INSTRUCTIONS

1. The term "Plaintiff" "you" or "your" refers to Jane Doe, and all her agents, employees, representatives, attorneys, accountants or anyone else acting on their behalf.

2. The terms "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. 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.

4. 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 the 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.

5. 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.

6. 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.

FOURTH SET OF INTERROGATORIES

1. Have you or your counsel entered into an agreement with 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). If so, please provide the following information:
 - a. State whether the agreement is oral or in writing (if the agreement is in writing, you may provide a copy of the agreement in response to this interrogatory);
 - b. State when the agreement was made;
 - c. State whether there is any memo, email, letter or similar document evidencing or memorializing the agreement;
 - d. Identify all parties to the agreement;
 - e. State the date each party entered into the agreement; and
 - f. Describe all terms and conditions of the agreement including, but not

limited to, what information, documents and communications are covered by the agreement, the duration of the agreement, disclosure of information to third parties and experts and all other terms and conditions.

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:
(Notary Seal)

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing has been served by fax and U.S. Mail to the following addressees on this ^{10th} day of April, 2010:

Brad Edwards, Esq.
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Co-Counsel for Defendant Jeffrey Epstein

By: 
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Florida Bar No. 224162

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(Co-Counsel for Defendant Jeffrey Epstein)