

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 JANE DOE NO. 5's SECOND SUPPLEMENTAL
ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES**

Plaintiff, JANE DOE NO. 5, by and through their undersigned counsel, and pursuant to Federal Rules of Civil Procedure Rule 33, hereby responds to Defendant, JEFFREY EPSTEIN'S First Set of Interrogatories to Plaintiff as follows:

General Objections

1. Plaintiff objects to Defendant's Interrogatories to the extent that the Interrogatories 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 Interrogatory, 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 Interrogatories to the extent that same are vague, ambiguous, incomprehensible and/or overly broad.

3. Plaintiff objects to Defendants' Interrogatories to the extent that the Interrogatories 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 Interrogatories as follows:

PLAINTIFF'S SECOND SUPPLEMENTAL

ANSWERS TO DEFENDANT'S FIRST INTERROGATORIES

11. List the names and business addresses of each physician (including psychiatrist, psychologist, etc.) or medical provider (including chiropractors) who has treated or examined you, and each medical facility where you have received any treatment or examination for the injuries for which you seek damages in this case; and state as to each the date of treatment or examination and the injury or condition for which you were examined or treated.

Answer:

Plaintiff objects to this interrogatory as vague, overly broad, unduly burdensome, premature, and calling for an expert opinion. Subject to said objections, Plaintiff states:

William G. Wood
Finney Psychotherapy
420 N. Center Dr., #141
Norfolk, VA 23502
2008-2009
Medication Management

Rebecca Thomas Psy.D. & Associates
838 Granby St.
Ste. 200
Norfolk, VA 23510
2008
Counseling

12. List the names and business addresses of all other physicians, medical facilities, rehab facilities (drug, alcohol or psychiatric) or other health care providers including psychiatrist, psychologist, mental health counselor and chiropractors by whom or at which you have been examined or treated in the past 10 years; and state as to each the dates of examination or treatment and the condition or injury for which you were examined or treated.

Answer:

Douglas Leonard Cassidy, [REDACTED]
1170 N. Military Hwy
Norfolk, VA 23502
2007-2008
Eye doctor

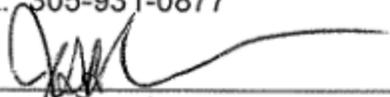
Bayview Medical Center
7924 Chesapeake Blvd.
Norfolk, VA 23518
2007
General family practice

March *Ue*, 2010

Respectfully submitted:

MERMELSTEIN & HOROWITZ P.A.
18205 Biscayne Blvd., Suite 2218
Miami, Florida 33160
[REDACTED]

Tel: 305-931-2200
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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 and facsimile to the following addressees this 20 day of March, 2010.

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303 Banyan Blvd., Suite 400
West Palm Beach, FL 33401

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Atterbury Goldberger & Weiss, ■
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012

Co-Counsel for Derendant Jeffrey Epstein



A handwritten signature in black ink is written over a horizontal line. The signature is stylized and appears to be the name of the person certifying the service.