

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 10-80309

JANE DOE NO. 103

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.
_____ /

CROSS-NOTICE OF TAKING DEPOSITION DUCES TECUM
(Undersigned Counsel Will be Appearing by Phone)

PLEASE TAKE NOTICE that at the below listed time and place the Plaintiff, JANE DOE NO. 103, by and through undersigned counsel, will take the deposition duces tecum (See attached Exhibit "A") of:

<u>NAME OF DEPONENT</u>	<u>DATE AND TIME</u>	<u>PLACE OF DEPOSITION</u>
George Rush c/o New York Daily News Legal Department Attn: Anne Carrol 450, West 33 rd Street New York, NY 10001	Wednesday March 31, 2010 2:00 p.m.	US Legal Support 1 Penn Plz, #1410 New York, NY 10119-1410 Phone: (212) 759-6014

upon oral examination before US Legal Support, a Notary Public, or any other notary public or officer authorized by law to take depositions in the State of Florida. The oral examination will continue from day to day until completed. This deposition is being taken for the purpose of

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discovery, for use at trial, or for such other purposes as are permitted under the rules of Court.

DATED this 25th day of March, 2010.

Respectfully submitted,

PODHURST ORSECK, P.A.
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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 25th day of **March, 2010**, a copy of the foregoing was served this day on all counsel of record on the attached Service List via e-mail transmission.

Respectfully submitted,

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SERVICE LIST

JANE DOE NO. 103 v. JEFFREY EPSTEIN
Case No.: 10-80309
United States District Court, Southern District of Florida

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Exhibit "A" – DUCES TECUM

All taped conversations between George Rush and Jeffrey Edward Epstein, including telephone recordings, all emails to and from Jeffrey Edward Epstein or someone representing themselves to be Jeffrey Epstein.