

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA  
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

CASE NO.: 502008CA028051XXXXMB AD

**PLAINTIFF'S REQUEST FOR PRODUCTION**  
**TO DEFENDANT**

**COMES NOW**, the Plaintiff, L.M., by and through her undersigned counsel, and requests that Defendant, JEFFREY EPSTEIN, produce the original or best copy of the items listed herein below, at the offices of the Plaintiff's undersigned counsel, for inspection and /or copying pursuant to the applicable Florida Rules of Civil Procedure, as follows:

1. The ENTIRE FILE (including all discovery) provided to you by the **State Attorney's Office**, and/or **Palm Beach County Police Department** and/or **U.S. Attorney's Office** and/or the **Federal Bureau of Investigation** relating to the Defendant, JEFFREY EPSTEIN.

2. All evidence, documents, statements, information, dvds, cds and ALL other information provided to Defendant, Epstein, or his attorneys in discovery by the Palm Beach State Attorney's Office, the Palm Beach Police Department, The FBI or the U.S. Attorney's office.

3. The confidentiality agreement signed by Alfredo Rodriguez related to his employment with Jeffrey Epstein.

I **HEREBY CERTIFY** that a copy of the foregoing was served by mail this 11 day of August, 2009 to: All those on the attached Service List.

ROTHSTEIN ROSENFELDT ADLER  
Attorneys for Plaintiff  
401 East Las Olas Blvd., Suite 1650  
Fort Lauderdale, Florida 33394  
Telephone [REDACTED]  
Telecopier [REDACTED]

By: 

Bradley J. Edwards  
Florida Bar No. 542075

[REDACTED]  
William J. Berger  
Florida Bar No. 197701  
[REDACTED]