

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE NO. 2, CASE NO.: 08-CV-80119-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 3, CASE NO.: 08-CV-80232-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 4, CASE NO.: 08-CV-80380-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 5, CASE NO.: 08-CV-80381-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 6, CASE NO.: 08-CV-80994-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 7, CASE NO.: 08- CV-80993-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

C.M.A., CASE NO.: 08- CV-80811 -MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE, CASE NO.: 08- CV-80893-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN, et al.,

Defendant.

_____ /

DOE II, CASE NO.: 08-CV- 80469-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN et al.,

Defendant.

_____ /

JANE DOE NO. 101,

CASE NO.: 08- CV-80591-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JANE DOE NO. 102,

CASE NO.: 08- CV-80656-MARRA/JOHNSON

Plaintiff,

vs.

JEFFREY EPSTEIN,

Defendant.

_____ /

JOINT MOTION FOR STIPULATED HIPAA PROTECTIVE ORDER

Plaintiffs, JANE DOES 2-7, by and through their undersigned counsel, hereby file this Unopposed Motion for Stipulated HIPAA Protective Order, and state as follows:

1. In the course of discovery in this case, the parties will be exchanging discovery concerning the Plaintiffs which is protected by Health Insurance Portability and Accountability Act of 1996 ("HIPAA").
2. These records include sensitive and confidential medical and therapy records.
3. Accordingly, the parties request the entry of the attached Stipulated HIPAA Protective Order to protect Plaintiffs' rights under HIPAA and allow Defendant to receive discovery of protected healthcare information under HIPAA.

4. A proposed Agreed Order is attached hereto as Exhibit "A".

WHEREFORE, Plaintiffs Jane Does 2-7, respectfully request that this Court enter the Stipulated HIPAA Protective Order attached as Exhibit "A".

Dated: July 1, 2009

Respectfully submitted,

By: s/ Adam D. Horowitz.
Adam D. Horowitz, Esq.
Stuart S. Mermelstein, Esq.
MERMELSTEIN & HOROWITZ, P.A.



Counsel for Plaintiffs Jane Does 2-8

By: s/ Robert D. Critton.
Robert D. Critton, Jr., Esq.



Counsel for Defendant Jeffrey Epstein

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2009, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day to all parties on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

/s/ Adam D. Horowitz

SERVICE LIST
DOE vs. JEFFREY EPSTEIN
United States District Court, Southern District of Florida

Jack Alan Goldberger, Esq.
[REDACTED]

Robert D. Critton, Esq.
[REDACTED]

Bradley James Edwards
[REDACTED]

Isidro Manuel Garcia
isidrogarcia@bellsouth.net

Jack Patrick Hill
[REDACTED]

Katherine Warthen Ezell
[REDACTED]

Michael James Pike
[REDACTED]

Paul G. Cassell
cassellp@law.utah.edu

Richard Horace Willits
[REDACTED]

Robert C. Josefsberg
[REDACTED]

/s/ Adam D. Horowitz