



Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

May 10, 2010

VIA FEDEX PRIORITY OVERNIGHT 7935 2823 3787
Honorable Donald W. Hafele
Main Judicial Complex
Palm Beach County Courthouse
205 North Dixie Highway
Room 11.1204
West Palm Beach, Florida 33401

Re: E.W v. Jeffrey Epstein / Case No. 502008CA028058XXXXMB AB
Plaintiffs' Responses to Defendant's Motion for Leave to Serve Additional
Interrogatories
Hearing on May 12, 2010 @ 8:45 AM

Dear Judge Hafele:

Enclosed please find EW's Responses to Defendant's Motion for Leave to Serve Additional
Interrogatories set for May 12, 2010 at 8:45AM.

Should you have any questions, please feel free to call.

Thank you for your consideration and interest.

Very truly yours,

Bradley J. Edwards

BJE/bw

Enc.

cc: Counsel

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
[REDACTED] 0 office [REDACTED] 2 fax

EFTA00727948

IN THE CIRCUIT COURT FOR THE
FIFTEENTH JUDICIAL CIRCUIT IN AND FOR
PALM BEACH COUNTY, FLORIDA

FILE NO. 502008CP003626XXXMB

E.W.,
Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF E.W.'S RESPONSE TO DEFENDANT'S
MOTION FOR LEAVE TO FILE ADDITIONAL INTERROGATORIES**

Plaintiff, E.W., hereby files this response to Defendant Epstein's Motion for Leave to File Additional Interrogatories. In support of this response, Plaintiff states as follows:

On February 25, 2010, Defendant, Jeffrey Epstein ("Epstein") propounded his Fourth Set of Interrogatories to Plaintiff.

Plaintiff objected to questions 3 – 12 pursuant to F.R.C.P. 1.340, which states, "The interrogatories shall not exceed 30, including all subparts, unless the court permits a larger number on motion and notice for good cause."

Plaintiff has answered over 30 interrogatories propounded by Epstein to date and Epstein has no good cause to ask for additional Interrogatories.

Epstein argues that he should be entitled to an additional 30 interrogatories because EW: a) is seeking significant damages and the nature of the case; b) is a witness in companion cases filed by victims against Epstein; and c) has not been deposed in this case.

Epstein has clearly obtained a vast amount of discovery, including that of the most sensitive and personal nature, from information about past sexual partners to abortion records, which E.W. has been made to hand over to the convicted sex offender who molested her.

Epstein has questioned Plaintiff's friends, family, neighbors, set many of them for deposition and hired investigators to follow and harass Plaintiff for the past two years.

The amount of damages sought by Plaintiff does not entitle the defendant to abuse the discovery process. This is not a complex litigation matter where vast amounts of quantitative data must be collected.

Contrary to Epstein's motion, E.W. was deposed in this case on May 6, 2010 and Plaintiff's have agreed to produce her a second time. Plaintiff was deposed for 4.5 hours the first day and was willing to continue, but Mr. Critton had to stop. E.W. was set to be deposed again the following day, but that deposition was cancelled by Epstein's counsel.

Defendant's motion is moot. Defendant could have easily asked all of the questions contained in Defendant's Fourth Interrogatories and questions about the other cases at Plaintiff's deposition on May 6, 2010, and if he forgot, then he will have yet *another* opportunity to do so in the future.

Epstein is a convicted sex offender, who has not denied a single allegation of Plaintiffs E.W. and L.M. He has used the discovery process to intimidate, harass and at times terrorize his victims, and this discovery is unnecessary and without purpose.

Epstein has not answered any discovery, instead he has taken the Fifth Amendment on all Interrogatory and deposition questions, yet remarkably, requests discovery beyond that permitted by the Rules of Procedure.

The fact that Epstein has not withdrawn this motion after deposing E.W. on May 6, 2010, cancelling E.W.'s continued deposition on May 7, 2010 and having a future opportunity to depose E.W. shows this motion is abusive and harassing and should be promptly denied.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served on May 10, 2010 via US Mail and email: Robert D. Critton, Jr., Esq., Burman, Critton, et al., 515 North Flagler Drive, Suite 400, West Palm Beach, FL 33401; Jay Howell, Esq., Jay Howell & Assoc., 644 Cesery Boulevard, Suite 250, Jacksonville, FL 32211; and Jack Alan Goldberger, Esq., Atterbury Goldberger et al., 250 Australian Ave. South, Suite 1400, West Palm Beach, FL 33401.

**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, PL**
425 N. Andrews Ave., Suite 2
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[REDACTED] fax
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By:



BRADLEY J. EDWARDS
Florida Bar No.: 542075