



Board Certified Civil Trial Lawyer  
Certified Circuit Mediator

LAW OFFICES OF  
**DAVID W. SPICER, P.A.**

11000 Prosperity Farms Road  
Suite 104  
Palm Beach Gardens, Florida 33410

Telephone: 561-625-6066  
Facsimile: 561-625-6016  
Toll Free Number: 1-877-34SPICER  
WWW.DAVIDSPICERLAW.COM

Sandra W. Hughes  
Paralegal/Office Administrator

Jill McClelland  
Legal Assistant

April 15, 2009

**VIA FACSIMILE AND U.S. MAIL**

Isidro Manuel [REDACTED], Esq.  
[REDACTED] Law Firm, P.A.  
224 Datura Street  
Suite 900  
West Palm Beach, FL 33401-5637

RE: Your Client: Jane Doe II - [REDACTED] [REDACTED]  
Case Number: CA 020614  
Our Client: Jeffrey Epstein

Dear Mr. [REDACTED]:

Enclosed is the Motion for Protective Order set for hearing tomorrow morning regarding Mr. Epstein's deposition. As you know, I have requested additional time to re-set this as I have just now come into the case. If we can work this out without the necessity of a hearing tomorrow morning, please advise.

Thank you for your cooperation in this matter.

Sincerely,

David W. Spicer

DWS/swh

Enclosure

cc: Jack A. Goldberger, Esq.  
Jeffrey Epstein

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

Case No. 502008 CA 020614XXXXMB AB  
Civil Division

JANE DOE II,

Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]

Defendants.

---

**NOTICE OF APPEARANCE**

NOTICE IS HEREBY GIVEN that David W. Spicer, Esquire of Law Offices of David W. Spicer, P.A., 11000 Prosperity Farms Road, Suite 104, Palm Beach Gardens, FL 33410 is appearing as counsel on behalf of the Defendant, Jeffrey Epstein.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished by facsimile and U.S. mail this 15 day of April, 2009, to all counsel on the attached service list:

**LAW OFFICE OF DAVID W. SPICER, P.A.**

11000 Prosperity Farms Road, Suite 104  
Palm Beach Gardens, FL 33410-3477  
(561) 625-6066-Telephone  
(561) 625-6016-Facsimile

[REDACTED]  
**David W. Spicer, Esquire**  
Florida Bar # 0306290

SERVICE LIST

██████████ D. Critton, Jr., Esq.  
Burman, Critton, Luttier & Coleman  
515 North Flagler Drive  
Suite 400  
West Palm Beach, FL 33401  
Telephone: ██████████

Jack Alan Goldberger, Esq.  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Ave. South  
Suite 1400  
West Palm Beach, FL 33401-5012  
Telephone: ██████████  
Facsimile: ██████████  
Co-Counsel for Defendant

Isidrio M. ██████████, Esq.  
██████████ Law Firm, P.A.  
224 Datura Street  
Suite 900  
West Palm Beach, FL 33401  
Telephone: ██████████  
Facsimile: ██████████  
Counsel for Plaintiff

Bruce Rhinehart, Esq.  
250 South Australian Blvd.  
Suite 1400  
West Palm Beach, FL 33401  
Telephone: ██████████  
Counsel for Co-Defendant

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

Case No. 502008 CA 020614XXXXMB AB  
Civil Division

JANE DOE II,

Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]  
[REDACTED],

Defendants.

---

**NOTICE OF HEARING**

TO: ALL PARTIES/ COUNSEL OF RECORD ON CERTIFICATE SERVICE.

**SPECIFIC MATTER(S) TO BE HEARD:** Defendant's Motion for Protective Order.

**PLEASE TAKE NOTICE** that the undersigned will call up the above matter for hearing

the following date and time:

**DATE:** Thursday, April 16, 2009

**TIME:** 8:45 a.m.

**JUDGE:** Judge Donald Hafele

**PLACE:** 205 North Dixie Highway, West Palm Beach, FL 33401  
Courtroom 11B

**RULE 4.** In accordance with Local Rule No. 4(2), before the time set forth for hearing above, undersigned counsel has made or will make a good [REDACTED] effort to resolve the matter.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished by facsimile and U.S. mail this 16 day of April, 2009, to all counsel on the attached service list:

**LAW OFFICE OF DAVID W. SPICER, P.A.**  
11000 Prosperity Farms Road, Suite 104  
Palm Beach Gardens, FL 33410-3477  
(561) 625-6066-Telephone  
(561) 625-6016-Facsimile



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Jack Alan Goldberger, Esq.  
Atterbury, Goldberger & Weiss, P.A.  
250 Australian Ave. South  
Suite 1400  
West Palm Beach, FL 33401-5012  
Telephone ██████████  
Facsimile: ██████████  
Co-Counsel for Defendant

Isidrio M. ████████, Esq.  
██████ Law Firm, P.A.  
224 Datura Street  
Suite 900  
West Palm Beach, FL 33401  
Telephone ██████████  
Facsimile: ██████████  
Counsel for Plaintiff

Bruce Rhinehart, Esq.  
250 South Australian Blvd.  
Suite 1400  
West Palm Beach, FL 33401  
Telephone: ██████████  
Counsel for Co-Defendant

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

Case No. 502008 CA 020614XXXXMB AB  
Civil Division

JANE DOE II,  
Plaintiff,

vs.

JEFFREY EPSTEIN and [REDACTED]  
[REDACTED],  
Defendants.

\_\_\_\_\_ /

**DEFENDANT, JEFFREY EPSTEIN'S  
MOTION FOR PROTECTIVE ORDER**

The Defendant, JEFFREY EPSTEIN, by and through the undersigned attorney pursuant to Florida Rules of Civil Procedure 1.280 ( c ) files the following Motion for Protective Order and as grounds therefore states as follows:

1. The undersigned has been retained as counsel for Defendant, JEFFREY EPSTEIN. A Substitution of Counsel for the Law Firm of Burman Critton Luttier & Coleman, LLP has been forwarded to the parties for the Defendant and execution has been approved by the parties and is pending submission to the Court.

2. The undersigned forwarded a letter via facsimile and U.S. Mail on April 14, 2009, requesting the re-scheduling of the deposition of the Defendant and have placed several telephone calls to counsel for the Plaintiff requesting the re-scheduling of the deposition of the Defendant. A

copy of the letter is attached hereto as Exhibit "A."

3. The Plaintiff has not responded to the request for the re-scheduling of the deposition.

4. The undersigned counsel requires sufficient time to review the file and consult with the Defendant regarding the testimony.

5. The matter has not been set for trial and the re-scheduling of the deposition will not prejudice the Plaintiff.

WHEREFORE, the Defendant, JEFFREY EPSTEIN, respectfully requests this Court enter an Order continuing the deposition of the Defendant until such time as counsel for the Defendant has had an opportunity to review the file and consult with the Defendant regarding the deposition testimony.

I HEREBY CERTIFY that a true and correct copy of the above and foregoing was furnished by facsimile and U.S. mail this 5<sup>th</sup> day of April, 2009, to all counsel on the attached service list:

**LAW OFFICE OF DAVID W. SPICER, P.A.**  
**Counsel for Defendant, JEFFREY EPSTEIN**  
11000 Prosperity Farms Road, Suite 104  
Palm Beach Gardens, FL 33410-3477  
(561) 625-6066-Telephone  
(561) 625-6016-Facsimile

  
David W. Spicer, Esquire  
Florida Bar # 0306290

RE: Jane Doe II/Epstein  
Case No. Case No. 502008 CA 020614XXXXMB AB  
Page 3

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West Palm Beach, FL 33401-5012  
Co-Counsel for Defendant

Isidrio M. ██████, Esq.  
██████ Law Firm, P.A.  
224 Datura Street  
Suite 900  
West Palm Beach, FL 33401  
Counsel for Plaintiff

Bruce Rhinehart, Esq.  
250 South Australian Blvd.  
Suite 1400  
West Palm Beach, FL 33401  
Telephone: 561-202-6360  
Counsel for Co-Defendant



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April 14, 2009

**VIA FACSIMILE AND U.S. MAIL**

Isidro Manuel [REDACTED], Esq.  
[REDACTED] Law Firm, P.A.  
224 Datura Street  
Suite 900  
West Palm Beach, FL 33401-5637

RE: Your Client: Jane Doe II - [REDACTED] [REDACTED]  
Case Number: CA 020614  
Our Client: Jeffrey Epstein

Dear Mr. [REDACTED]:

Please be advised that I have been retained by Jeffrey Epstein to represent him in the above matter. My firm will be submitting a Substitution of Counsel for the Burman Critton Luttier & Coleman Law Firm. It is my understanding that you have set Mr. Epstein for deposition on April 16, 2009. I would appreciate your re-scheduling the deposition of Mr. Epstein so I may have the opportunity to review the file.

I am presently in an all day mediation today and would appreciate your contacting my office at your earliest opportunity regarding this request. Thank you for your anticipated cooperation.

Sincerely,

[REDACTED]  
David W. Spicer  
DWS/swh  
cc: Jack A. Goldberger, Esq.  
Jeffrey Epstein

Signed in the absence of  
David W. Spicer to expedite delivery

