

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

CASE NO. 502008CA028051XXXXMB AB

█.,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

MOTION FOR PROTECTIVE ORDER
AS TO THE DEPOSITION OF █ █

Third-Party Witness, █ █, by and through her undersigned attorney, Jack A. Goldberger, and pursuant to Rule 1.280(c), Florida Rules of Civil Procedure, moves for a Protective Order to reschedule her deposition currently set for Monday, March 1, 2010 and states:

1. On February 3, 2010, counsel for Plaintiff, █., filed a Notice of Taking the Deposition of Third-Party Witness, █ █.

2. A Motion for Protective Order has been filed in Federal Court with respect to the same issue *See Attached Exhibit A* For the reasons set forth in the attached Motion, Third-Party Witness, █ █, adopts same.

3. Undersigned counsel has agreed to provide dates to reschedule Ms. █ deposition *See Attached Exhibit B*

4. To avoid duplication, the same Motion for Protective Order is applicable in █ v. Jeffrey, Case No: 502008CA028058XXXXMB and █. v. Jeffrey Epstein, Case No: 502008CA037319XXXXMB.

WHEREFORE, Third-Party Witness, █ █, respectfully requests the

Court enter a protective order allowing her deposition to be rescheduled from March 1, 2010, to another date to be agreed upon by all interested parties.

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was sent by fax and U.S. Mail to the following addressees on this 13th day of October, 2009:

■ Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos &
Lehrman, PL
425 N. Andrews Avenue
Suite 2
Fort Lauderdale, FL 33301
954-524-2820 Phone
954-524-2822 Fax
Counsel for Plaintiff ■ & EW

Jay Howell, Esq.
Jay Howell & Associates, P.A.
644 Cesery Boulevard
Suite 250
Jacksonville, FL 32211
904-680-1234 Phone
904-680-1238 Fax
Co-counsel for Plaintiff

■ D. Critton, Esq.
Burman Critton Luttier & Coleman, LLP
303 Banyan Blvd.
Suite 400
West Palm Beach, FL 33401-5012
Fax: 561-842-2820
Counsel for Defendant Jeffrey Epstein

Spencer T. Kuvin, Esq.
Leopold-Kuvin, P.A.
2925 PGA Blvd., Suite 200
Palm Beach Gardens, FL 33410
Fax: 561 697 2383
Counsel for Plaintiff ■

ATTERBURY GOLDBERGER & WEISS, PA
250 Australian Avenue South
Suite #1400
West Palm Beach, FL 33401
(561) 659-8300

By: _____
JACK A. GOLDBERGER, ESQ.
Florida Bar No: 262013