

IN THE CIRCUIT COURT OF THE 15th
JUDICIAL CIRCUIT IN AND FOR PALM
BEACH COUNTY, FLORIDA

CASE NO: 502008CA028051XXXXMB AB

■

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.

**PLAINTIFF'S AMENDED RESPONSES TO DEFENDANTS
SECOND REQUEST FOR PRODUCTION**

Plaintiff, ■, hereby files her Amended Responses to Defendant's Second Request for Production, pursuant to the Court Order modifying same dated October 21, 2009.

- 1. All documents which relate to your earnings as a prostitute or call girl.**

None.

- 2. The book containing a reference to a Bible verse on the cover which you testified contains records of your earnings as a prostitute or call girl from 2007-2008. See ■'s 9/24/09 Deposition Transcript at 59-60**

Not in Plaintiff's possession. Plaintiff does not know the whereabouts of the book.

- 3. All books, journals, diaries, logs, calendars or similar documents reflecting your earnings as a prostitute or call girl from 2006 to 2009. See ■'s 9/24/09 Deposition Transcript at 61-63.**

None.

4. **All books, journals, diaries, logs, calendars or similar documents reflecting the names of any individuals you brought to the home of Mr. Epstein.**

Not in Plaintiff's possession. Plaintiff has no knowledge of whereabouts.

5. **All documents reflecting the names, telephone number addresses, dates and/or income received from any individuals who paid you for sex or to engage in sexual activity.**

None.

6. **All documents reflecting the names, telephone numbers, addresses, dates and/or income received from any individuals who paid you for a massage.**

None.

7. **All photographs, movies, dvds and videotapes which you performed sexual acts or simulated sexual acts.**

None in Plaintiff's possession. Plaintiff has no knowledge of whereabouts.

8. **The video in which you testified you were engaged in sexual act(s) in 2007, when you were nineteen (19) years old. See [REDACTED]. Deposition transcript at 112-17.**

None in Plaintiff's possession. Plaintiff has no knowledge of whereabouts.

9. **All photographs, movies, dvds and videotapes which depict you performing at an adult entertainment establishment.**

None.

10. **All prescription bottles, receipts or documents reflecting medication you were prescribed.**

Objection. Irrelevant, not reasonably calculated to lead to admissible evidence, not limited in time or scope, violation of privacy. Without waiving said objection, none in Plaintiff's possession.

11. **All documents which relate to your employment in what were testified were "bunny ranch" shops, including any photographs, movies, dvds and/or videotapes. See L. M. Deposition transcript at 46.**

None.

12. All messages you sent or received on [REDACTED] which relate to Jeffrey Epstein or this lawsuit.

None.

13. All emails you sent or received which relate to Jeffrey Epstein or this lawsuit.

None.

14. All emails you sent or received which relate to your occupation as a prostitute including all emails sent to or received from individuals paid you for sex or to engage in sexual activity.

None.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the above and a copy of the foregoing has been provided this 3rd day of February 2010 via U.S. Mail, facsimile (561) 253-0164 and email transmittal to all those on the attached service list.

**Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman,** [REDACTED]
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By:


BRADLEY J. EDWARDS
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