

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 RESPONSE TO REQUEST FOR ADMISSIONS

Plaintiff, █, hereby files her Response to Jeffrey Epstein's Request for Admissions dated March 12, 2010 as follows:

1. Plaintiff is unable to admit or deny. Plaintiff made a reasonable inquiry and the information known or obtainable by Plaintiff is insufficient to enable Plaintiff to admit or deny. Specifically, Defendant is requesting an admission by Plaintiff that the "history" given by █ to Dr. Hall was "completely and truly accurate" at the CME on February 15, 2010. This is not possible to answer without a copy of the "history" provided. █ does not have that history in her possession and has requested it from Defendant. Once this "history" is provided to █, █ will then be in a position to admit or deny.
2. See #1
3. Plaintiff is unable to admit or deny. Plaintiff made a reasonable inquiry and the information known or obtainable by Plaintiff is insufficient to enable Plaintiff to admit or deny. Specifically, Defendant is requesting an admission by Plaintiff that the "background information" given by █ to Dr. Hall was "completely and truly accurate" at the CME on February 15, 2010. This is not possible to answer without a copy of the "background information" provided at this time. █ does not have that background information in her possession and has requested it from Defendant. Once this "background information" is provided to █, █ will then be in a position to admit or deny.
4. See #3
5. Deny.

6. Admit, in that the examiner acted professionally under the circumstances.
7. Admit, in part and deny in part in that he attempted to be respectful and fair, however, the inquiry into sensitive subject matter is/was unfair.
8. Deny.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been provided this 15th day of April 2010 via U.S. Mail and email transmittal to all those on the attached service list.

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Edwards, Fistos & Lehrman, P.L.**
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By:



BRADLEY J. EDWARDS
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