

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

CASE NO: 502008CA028051XXXMB AB

■  
Plaintiff,

v.

JEFFREY EPSTEIN,

Defendant.  
\_\_\_\_\_ /

**RESPONSE TO DEFENDANTS  
REQUEST SECOND FOR PRODUCTION**

Plaintiff, ■, hereby files her Response 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.**

Objection, irrelevant and not reasonably calculated to lead to discoverability of admissible evidence. Without waiving said objection, 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**

See Response to Request to Produce Number 1 above, also objections as to privacy right.

- 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.**

See Response to Request to Produce Number 1 above, also objection as to privacy right.

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

None in Plaintiff's possession.

- 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.**

Objection, irrelevant and not reasonably calculated to lead to admissible evidence, privacy and Plaintiff and third parties. Without waiving said objection, none.

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

Objection, irrelevant and not reasonably calculated to lead to admissible evidence, privacy and Plaintiff and third parties. Without waiving said objection, none.

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

None in Plaintiff's possession.

- 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.

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

See Response to Number 7 above.

- 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 in Plaintiff's possession.

12. **All messages you sent or received on Myspace.com which relate to Jeffrey Epstein or this lawsuit.**

*Myspace* pages in Plaintiff's possession have been produced.

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

Objection, the Court already ruled that emails were not discoverable based on Plaintiff's privacy rights. Without waiving said objections, 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.**

Objection, the Court already ruled that emails were not discoverable based on Plaintiff's privacy rights. Without waiving said objections, none.

### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the original of the above and a copy of the foregoing has been provided this 13<sup>th</sup> day of January 2010 via U.S. Mail and email transmittal to all those on the attached service list.

Farmer, Jaffe, Weissing,  
Edwards, Fistos & Lehrman, P.L.  
425 N. Andrews Ave., Suite 2  
Fort Lauderdale, FL 33301  
(954) 524-2820  
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By:

A blue ink handwritten signature consisting of several overlapping loops and flourishes.

BRADLEY J. EDWARDS  
Florida Bar No.: 542075

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