

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 13th day of January 2010 via U.S. Mail and email transmittal to all those on the attached service list.