

UNITED STATES DISTRICT COURT

Southern District of Florida

Case Number: 08-CV-80893-MARRA-JOHNSON

JANE DOE

Plaintiff

v.

JEFFREY EPSTEIN

Defendant

SEALED DOCUMENT TRACKING FORM

Party Filing Matter Under Seal

Name: Bradley J. Edwards

Address: 425 N. Andrews Ave., Ste 2, Ft. Lauderdale, FL 33301

Telephone: 954-524-2820

On behalf of (select one):

☒ Plaintiff

☐ Defendant

Date sealed document filed: 7/2/2010

If sealed pursuant to statute, cite statute: _____

If sealed pursuant to previously entered protective order, date of order and docket entry number: _____

The matter should remain sealed until:

☐ Conclusion of Trial

☐ Arrest of First Defendant

☐ Case Closing

☐ Conclusion of Direct Appeal

☐ Other: _____

☒ Permanently. Specify the authorizing law, rule, court order: _____

The moving party requests that when the sealing period expires, the filed matter should be (select one):

☐ Unsealed and placed in the public portion of the court file

☐ Destroyed

☒ Returned to the party or counsel for the party, as identified above



Attorney for:

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

_____ /

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

_____ /

**PLAINTIFF'S MOTION TO FILE PLAINTIFF JANE DOE'S EMERGENCY MOTION
FOR A HEARING, FINDING THAT EPSTEIN IS IN CIVIL CONTEMPT OF THE
COURT'S TWO ORDERS FORBIDDING HARASSMENT AND INDIRECT CONTACT,
FOR APPROPRIATE SANCTIONS AND ADDITIONAL REMEDIES INCLUDING
REFERRAL FOR CRIMINAL CONTEMPT UNDER SEAL**

Plaintiff, Jane Doe, hereby moves this Court for an Order permitting Plaintiff Jane Doe's Emergency Motion for a Hearing, Finding that Epstein in Civil Contempt of the Court's Two Orders Forbidding Harassment and Indirect Contact for Appropriate Sanctions and Additional Remedies Including Referral for Criminal Contempt to be filed under seal and would state:

Jane Doe requests this Emergency Motion be Filed Under Seal as Defendant, Epstein's blatant defiance of this Court no-harassment order appears to be designed by him to intimidate not only Jane Doe but also other witnesses in the case (i.e., other young girls that he sexually abused). The Sealing of this Motion is necessary to protect the safety of Jane Doe and other witnesses.

Therefore, the undersigned respectfully requests permission to file Jane Doe's Emergency Motion for a Hearing, Finding that Epstein in Civil Contempt of the Court's Two Orders Forbidding Harassment and Indirect Contact for Appropriate Sanctions and Additional Remedies Including Referral for Criminal Contempt Under Seal.

DATED: July 2, 2010

Respectfully Submitted,



Bradley J. Edwards
FARMER, JAFFE, WEISSING,
EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
Facsimile (954) 524-2822
Florida Bar No.: 542075
E-mail: [REDACTED]

and

Paul G. Cassell
Pro Hac Vice
332 S. 1400 E.
Salt Lake City, UT 84112
Telephone: 801-585-5202
Facsimile: 801-585-6833
E-Mail: cassellp@law.utah.edu

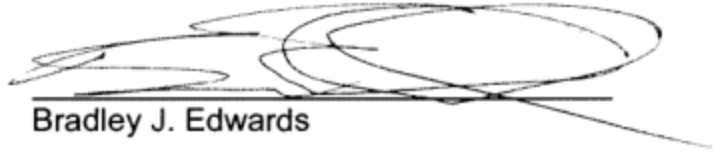
CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing was sent via CM/ECF and U.S. mail on July 2, 2010 to:

Robert D. Critton, Jr.
BURMAN, CRITTON, et al.
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

Jack Alan Goldberger, Esq.
Atterbury Goldberger et al.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401

Counsel for Jeffrey Epstein



Bradley J. Edwards

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

JANE DOE,

CASE NO. 08-CV-80893-CIV-MARRA/JOHNSON

Plaintiff,

Vs.

JEFFREY EPSTEIN, et al.

Defendant.

Related Cases:

08-80119, 08-80232, 08-80380, 08-80381,
08-80994, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092

[Proposed] ORDER GRANTING PLAINTIFF'S MOTION TO FILE PLAINTIFF JANE DOE'S EMERGENCY MOTION FOR A HEARING, FINDING THAT EPSTEIN IS IN CIVIL CONTEMPT OF THE COURT'S TWO ORDERS FORBIDDING HARASSMENT AND INDIRECT CONTACT, FOR APPROPRIATE SANCTIONS AND ADDITIONAL REMEDIES INCLUDING REFERRAL FOR CRIMINAL CONTEMPT UNDER SEAL

THIS CAUSE is before the Court upon Plaintiff's Motion to File Plaintiff Jane Doe's Emergency Motion for a Hearing, Finding that Epstein in Civil Contempt of the Court's Two Orders Forbidding Harassment and Indirect Contact for Appropriate Sanctions and Additional Remedies Including Referral for Criminal Contempt Under Seal. The Court has carefully considered the Motion and is otherwise fully advised in the premises.

The Court finds a reasonable basis to allow the Motion and accompanying documents to be filed under seal. See S.D. Fla. L.R.5.4.B(2) ("any party seeking to make a filing under seal shall . . . [set] forth a reasonable basis for departing from the general policy of a public filing.").

Accordingly, it is hereby **ORDERED AND ADJUDGED** as follows:

1. Plaintiff's Motion to File Plaintiff Jane Doe's Emergency Motion for a Hearing, Finding that Epstein in Civil Contempt of the Court's Two Orders Forbidding Harassment and Indirect Contact for Appropriate Sanctions and Additional Remedies Including Referral for Criminal Contempt Under Seal is hereby **GRANTED**.
2. The proposed documents are hereby sealed and shall remain permanently sealed.

DONE AND ORDERED in West Palm Beach, Florida this ____ day of _____, 2010.

KENNETH A. MARRA
United States District Judge

cc: Counsel of record