

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 08-CIV- 80893 – MARRA/JOHNSON

JANE DOE,

Plaintiff,

v.

JEFFREY EPSTEIN,

Defendants.

_____ /

Joint Stipulation

Plaintiff, JANE DOE and Defendant, JEFFREY EPSTEIN (“Epstein”), hereby file their Joint Stipulation Regarding Certain Correspondence Obtained By Jane Doe’s attorneys during discovery, and each state:

1. In July 2010, the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos and Lehrman, PL. (the “Law Firm”), Paul G. Cassell, Esq. and Jay Howell, Esq. (“Plaintiff’s Lawyers”) received through discovery certain correspondence between Epstein’s agents and federal prosecutors (the “Correspondence”).

2. With the exception of the Addendum to Settlement Agreement entered into in the above-styled matter and in the matters of ██████ vs. Epstein, CASE NO. 502008CA028051XXXXMB AB and ██████ vs. Epstein, CASE NO. 502008CA028058XXXXMB AD, The Law Firm and Plaintiff’s Lawyers hereby agree that neither they nor their agents, lawyers, partners or employees will disseminate the Correspondence to any third parties including, but not limited to, news media, and will only use

the Correspondence for purposes of the uses specifically outlined in paragraph 3 of the Addendums to Settlement referenced above and only after notice is given as provided for in paragraph 3 of the Addendums to Settlement.

3. To the extent the Law Firm or Plaintiff's Lawyers have additional lawsuits against Epstein, the information may be used in those lawsuits after 7 days notice is provided to Mr. Epstein.

WHEREFORE, Plaintiff and Defendant requests that the Court enter an order on the above stipulation, and grant any additional relief the Court deems just and proper.

Local Rule 7.1 Statement

Pursuant to the above rule, the undersigned counsel and Plaintiff's counsel have conferred and have agreed to same.

Respectfully submitted,

By: /s/ Robert D. Critton, Jr.
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162

Certificate of Service

I HEREBY CERTIFY that a true copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record identified on the following service list in the manner specified via transmission of Notices of Electronic Filing generated by CM/ECF on this ___ day of July, 2010:

Brad Edwards, Esq.
Farmer, Jaffe, Weissing, Edwards, Fistos
& Lehrman, PL
425 N. Andrews Ave.
Suite #2
Fort Lauderdale, FL 33301
[REDACTED]

Jack Alan Goldberger, Esq.
Atterbury Goldberger & Weiss, P.A.
250 Australian Avenue South
Suite 1400
West Palm Beach, FL 33401-5012
[REDACTED]

[REDACTED]
[REDACTED]

Paul G. Cassell, Esq.
Pro Hac Vice
332 South 1400 E, Room 101
Salt Lake City, UT 84112

[REDACTED]

Co-counsel for Plaintiff

[REDACTED]

Co-Counsel for Defendant Jeffrey Epstein

By: /s/ Robert D. Critton, Jr.
ROBERT D. CRITTON, JR., ESQ.
Florida Bar No. 224162

[REDACTED]
MICHAEL J. PIKE, ESQ.
Florida Bar #617296

[REDACTED]
BURMAN, CRITTON, LUTTIER & COLEMAN, LLP
303 Banyan Boulevard, Suite 400
West Palm Beach, FL 33401

[REDACTED] he

(Co-Counsel for Defendant Jeffrey Epstein)